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5 JAN 1983

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Part A Application (Copy, Revised)

40 CFR 122.25(a)

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Appendix

Copy of Contingency Plan

RECEIVED  
1-5-83  
COPY





UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION V

111 West Jackson Blvd  
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF  
RCRA ACTIVITIES

MAY 27 1982

Robert A. Girman, Manager  
McKesson Chemical Company  
26601 Richmond Road

Bedford Heights, Ohio 44146

RE: Interim Status Acknowledgement

USEPA ID No. OHD071107791

FACILITY NAME: McKesson Chemical Company

Dear Mr. Girman:

This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265, or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 122.23; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief  
Waste Management Branch

RECEIVED

JUN 1 1982

Enclosure  
cc: J.P. Hope, Regional Vice President

McKesson Chemical Co.  
CLEVELAND

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE	UNIT OF MEASURE	CODE
<b>STORAGE:</b>				
			GALLONS	G
			LITERS	L
CONTAINER	S01	G or L	CUBIC YARDS	Y
TANK	S02	G or L	CUBIC METERS	C
WASTE PILE	S03	Y or C	GALLONS PER DAY	U
SURFACE IMPOUNDMENT	S04	G or L	LITERS PER DAY	V
<b>DISPOSAL:</b>				
			TONS PER HOUR	D
			METRIC TONS/HOUR	W
INJECTION WELL	D79	G, L, U, or V	GALLONS/HOUR	E
LANDFILL	D80	A or F	LITERS/HOUR	H
LAND APPLICATION	D81	B or Q	ACRE-FEET	A
OCEAN DISPOSAL	D82	U or V	HECTARE-METER	F
SURFACE IMPOUNDMENT	D83	G or L	ACRES	B
<b>TREATMENT:</b>				
			HECTARES	Q
			POUNDS/HOUR	J
TANK	T01	U or V	KILOGRAMS/HOUR	R
SURFACE IMPOUNDMENT	T02	U or V	TONS PER DAY	N
INCINERATOR	T03	D, W, E, or H	METRIC TONS/DAY	S
OTHER	T04	U, V, J, R, N, or S		

FORM 1 GENERAL		U.S. ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION Consolidated Permits Program (Read the "General Instructions" before starting.)		I. EPA I.D. NUMBER F 0 H D 0 7 1 1 0 7 7 9 1 D	
LABEL ITEMS		PLEASE PLACE LABEL IN THIS SPACE		GENERAL INSTRUCTIONS	
EPA I.D. NUMBER				If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.	
III. FACILITY NAME					
V. FACILITY MAILING ADDRESS					
VI. FACILITY LOCATION					

II. POLLUTANT CHARACTERISTICS	
INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.	
SPECIFIC QUESTIONS	MARK 'X'
	YES NO FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)	<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>
E. Does or will this facility <del>store, process or</del> store, process or dispose of hazardous wastes? (FORM 3)	<input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)	<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)	<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>
B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)	<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>
D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)	<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)	<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)	<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>
J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)	<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>

III. NAME OF FACILITY	
1	SKIP M.C.K.E.S.S.O.N. C.H.E.M.I.C.A.L. C.O.M.P.A.N.Y.

IV. FACILITY CONTACT	
A. NAME & TITLE (last, first, & title)	B. PHONE (area code & no.)
2 M.O.L.L. C.L.I.F.F. B.R.A.N.C.H. M.A.N.A.G.E.R.	216 292 7500

V. FACILITY MAILING ADDRESS	
A. STREET OR P.O. BOX	B. CITY OR TOWN
3 26601 RICHMOND ROAD	4 BEDFORD HEIGHTS
C. STATE D. ZIP CODE	
OH	44146

VI. FACILITY LOCATION	
A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER	B. COUNTY NAME
5 26601 RICHMOND ROAD	CUYAHOGA
C. CITY OR TOWN	D. STATE E. ZIP CODE F. COUNTY CODE (if known)
6 BEDFORD HEIGHTS	OH 44146

## VIII. OPERATOR INFORMATION

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)				D. PHONE (area code & no.)						
F = FEDERAL	M = PUBLIC (other than federal or state)	P	(specify)	C	4 1 5		9 8 3		8 3 0 0	
S = STATE	O = OTHER (specify)			A						
P = PRIVATE				15	16 - 19		19 - 21		22 - 25	
				56						

F. CITY OR TOWN										G. STATE		H. ZIP CODE		IX. INDIAN LAND	
S A N F R A N C I S C O										C A		9 4 1 0 4		Is the facility located on Indian lands?	
														<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	

## XI. MAP

XII. NATURE OF BUSINESS (provide a brief description)

being distributed to a customer by our branch.

XIII. CERTIFICATION (see instructions)

<b>A. NAME &amp; OFFICIAL TITLE</b> <i>(type or print)</i> R. R. Powell Regional Vice President	<b>B. SIGNATURE</b> 	<b>C. DATE SIGNED</b> 11/24/9
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COMMENTS FOR OFFICIAL USE ONLY	
C	
C	
15	16

Foremost-McKesson  
Chemical Group

McKesson Chemical Company  
Eastern Region  
136 Summit Avenue  
Montvale, NJ 07645  
201 573 9480

John P. Hobe  
Regional Vice President



November 18, 1980

EPA Region V  
RCRA Activities  
P. O. Box 7861  
Chicago, IL 60680

Gentlemen:

On or prior to August 18, 1980, we filed with your office a Notification of Hazardous Waste Activity for our facility at Cleveland, OH.

In that Notification we advised the facility would act as a generator and transporter of hazardous waste.

We are primarily distributors of industrial chemicals for various chemical producers throughout the country. As an accomodation to our customers it is our intent to, from time to time, pick up a few drums of material from our customer's facility that would fit the classification of a recycler for recycling, not for disposal. Because of the distance this material must be transported, it would be necessary at times to store some of these drums on our facility for short periods to enable us to accumulate sufficient drums to make the transport economic.

We are informed that even though as a generator of hazardous waste we would be authorized to store our own waste for up to 90 days without requiring a permit, the storage of similar material belonging to our customers, in the course of transporting it to a recycler, would constitute our facility a hazardous waste management (storage) facility, for which a permit would be required.



November 18, 1980

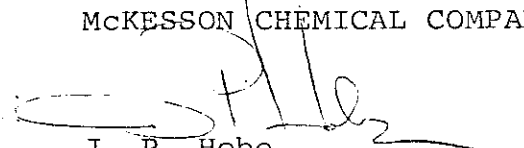
Page 2

Since we believe that what we propose would be a sound and responsible hazardous waste management activity, we would like to have the opportunity to do this. We are also advised that this requires an amendment of the Notification previously filed with you and the filing of a Part A permit application. We respectfully ask that this letter be accepted as an amendment to our Notification. We acknowledge certain items of information are missing (e.g. facility drawings, photographs, and geographic location), and will forward them as soon as they are obtained.

We would ask acknowledgement of your acceptance of this amendment. For your convenience, we enclose a copy of this letter on which your acknowledgement can be noted, and a stamped, self-addressed envelope with which it may be returned to us. Thank you for your very kind cooperation.

Respectfully,

McKESSON CHEMICAL COMPANY



J. P. Hobe  
Regional Vice President

Enclosure

ACCEPTED:

Environmental Protection Agency  
Region \_\_\_\_\_

By: \_\_\_\_\_

FORM <b>1</b> GENERAL		U.S. ENVIRONMENTAL PROTECTION AGENCY <b>GENERAL INFORMATION</b> Consolidated Permits Program (Read the "General Instructions" before starting.)		I. EPA I.D. NUMBER <div style="border: 1px solid black; padding: 2px;">F 0 4 D 0 7 1 1 0 7 7 9 1</div>	
LABEL ITEMS		PLEASE PLACE LABEL IN THIS SPACE		GENERAL INSTRUCTIONS	
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III. FACILITY NAME					
V. FACILITY MAILING ADDRESS					
VI. FACILITY LOCATION					
<b>II. POLLUTANT CHARACTERISTICS</b>					
<p><b>INSTRUCTIONS:</b> Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.</p>					
SPECIFIC QUESTIONS			SPECIFIC QUESTIONS		
			MARK 'X'		
			YES NO FORM ATTACHED		
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)			B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)			D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)			F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)			H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		
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<b>III. NAME OF FACILITY</b>					
1 SKIP <u>Mc Kesson Chemical Company</u>					
<b>IV. FACILITY CONTACT</b>					
A. NAME & TITLE (last, first, & title) B. PHONE (area code & no.)					
2 <u>Girman Robert A. Manager</u> <u>216</u> <u>292</u> <u>7500</u>					
<b>V. FACILITY MAILING ADDRESS</b>					
A. STREET OR P.O. BOX B. CITY OR TOWN C. STATE D. ZIP CODE					
3 <u>26601 Richmond Road</u> <u>Bedford Heights</u> <u>OH</u> <u>44146</u>					
<b>VI. FACILITY LOCATION</b>					
A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER B. COUNTY NAME C. CITY OR TOWN D. STATE E. ZIP CODE F. COUNTY CODE (if known)					
5 <u>26601 Richmond Road</u> <u>Cuiahoga</u> <u>Bedford Heights</u> <u>OH</u> <u>44146</u>					

## VIII. OPERATOR INFORMATION

**C. STATUS OF OPERATOR** (Enter the appropriate letter into the answer box; if "Other", specify.)

F. CITY OR TOWN																G. STATE		H. ZIP CODE		IX. INDIAN LAND	
San Francisco																CA		94104		Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	

## XI. MAP

XII. NATURE OF BUSINESS (provide a brief description)

XIII. CERTIFICATION (see instructions)

COMMENTS FOR OFFICIAL USE ONLY	
C	
C	
15	16

<div style="display: flex; align-items: center; justify-content: center;"><div style="text-align: center; margin-right: 10px;"><b>FORM 3</b> RCRA</div><div style="text-align: center; margin-right: 10px;"></div><div style="text-align: center;"><b>U.S. ENVIRONMENTAL PROTECTION AGENCY</b> <b>HAZARDOUS WASTE PERMIT APPLICATION</b> <i>Consolidated Permits Program</i> <small>(This information is required under Section 3005 of RCRA.)</small></div></div>		<b>I. EPA I.D. NUMBER</b>																																																							
		S <span style="border: 1px solid black; padding: 2px;">0</span> A <span style="border: 1px solid black; padding: 2px;">H</span> D <span style="border: 1px solid black; padding: 2px;">0</span> 7 <span style="border: 1px solid black; padding: 2px;">1</span> 1 <span style="border: 1px solid black; padding: 2px;">0</span> 7 <span style="border: 1px solid black; padding: 2px;">7</span> 9 <span style="border: 1px solid black; padding: 2px;">1</span> T/A/C <span style="border: 1px solid black; padding: 2px;">1</span>																																																							
<b>FOR OFFICIAL USE ONLY</b>																																																									
<b>APPLICATION APPROVED</b>		<b>DATE RECEIVED (yr., mo., &amp; day)</b>																																																							
APR 23 1984		APR 23 1984																																																							
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<b>II. FIRST OR REVISED APPLICATION</b>																																																									
<p>Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.</p>																																																									
<p><b>A. FIRST APPLICATION</b> (place an "X" below and provide the appropriate date)</p>																																																									
<input checked="" type="checkbox"/> <b>1. EXISTING FACILITY</b> (See instructions for definition of "existing" facility. Complete item below.)		<input type="checkbox"/> <b>2. NEW FACILITY</b> (Complete item below.)																																																							
<div style="display: flex; align-items: center;"><div style="text-align: center; margin-right: 10px;">YR. <span style="border: 1px solid black; padding: 2px;">83</span> MO. <span style="border: 1px solid black; padding: 2px;">03</span> DAY <span style="border: 1px solid black; padding: 2px;">01</span></div><div>FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., &amp; day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)</div></div>		<div style="display: flex; align-items: center;"><div style="text-align: center; margin-right: 10px;">YR. <span style="border: 1px solid black; padding: 2px;"></span> MO. <span style="border: 1px solid black; padding: 2px;"></span> DAY <span style="border: 1px solid black; padding: 2px;"></span></div><div>FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., &amp; day) OPERATION BEGAN OR IS EXPECTED TO BEGIN</div></div>																																																							
<p><b>B. REVISED APPLICATION</b> (place an "X" below and complete Item I above)</p>																																																									
<input type="checkbox"/> <b>1. FACILITY HAS INTERIM STATUS</b>		<input type="checkbox"/> <b>2. FACILITY HAS A RCRA PERMIT</b>																																																							
<b>III. PROCESSES - CODES AND DESIGN CAPACITIES</b>																																																									
<p><b>A. PROCESS CODE</b> - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).</p>																																																									
<p><b>B. PROCESS DESIGN CAPACITY</b> - For each code entered in column A enter the capacity of the process.</p>																																																									
<div style="display: flex; justify-content: space-between;"><div style="width: 48%;"><table border="1" style="width: 100%; border-collapse: collapse;"><thead><tr><th>PROCESS</th><th>PRO-CESS CODE</th><th>APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY</th></tr></thead><tbody><tr><td colspan="3"><b>Storage:</b></td></tr><tr><td>CONTAINER (barrel, drum, etc.)</td><td>S01</td><td>GALLONS OR LITERS</td></tr><tr><td>TANK</td><td>S02</td><td>GALLONS OR LITERS</td></tr><tr><td>WASTE PILE</td><td>S03</td><td>CUBIC YARDS OR CUBIC METERS</td></tr><tr><td>SURFACE IMPOUNDMENT</td><td>S04</td><td>GALLONS OR LITERS</td></tr><tr><td colspan="3"><b>Disposal:</b></td></tr><tr><td>INJECTION WELL</td><td>D79</td><td>GALLONS OR LITERS</td></tr><tr><td>LANDFILL</td><td>D80</td><td>ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER</td></tr><tr><td>LAND APPLICATION</td><td>D81</td><td>ACRES OR HECTARES</td></tr><tr><td>OCEAN DISPOSAL</td><td>D82</td><td>GALLONS PER DAY OR LITERS PER DAY</td></tr><tr><td>SURFACE IMPOUNDMENT</td><td>D83</td><td>GALLONS OR LITERS</td></tr></tbody></table></div><div style="width: 48%;"><table border="1" style="width: 100%; border-collapse: collapse;"><thead><tr><th>PROCESS</th><th>PRO-CESS CODE</th><th>APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY</th></tr></thead><tbody><tr><td colspan="3"><b>Treatment:</b></td></tr><tr><td>TANK</td><td>T01</td><td>GALLONS PER DAY OR LITERS PER DAY</td></tr><tr><td>SURFACE IMPOUNDMENT</td><td>T02</td><td>GALLONS PER DAY OR LITERS PER DAY</td></tr><tr><td>INCINERATOR</td><td>T03</td><td>TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR</td></tr><tr><td>OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)</td><td>T04</td><td>GALLONS PER DAY OR LITERS PER DAY</td></tr></tbody></table></div></div>				PROCESS	PRO-CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	<b>Storage:</b>			CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	S02	GALLONS OR LITERS	WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS	<b>Disposal:</b>			INJECTION WELL	D79	GALLONS OR LITERS	LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER	LAND APPLICATION	D81	ACRES OR HECTARES	OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY	SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS	PROCESS	PRO-CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	<b>Treatment:</b>			TANK	T01	GALLONS PER DAY OR LITERS PER DAY	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR	OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY
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PROCESS	PRO-CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY																																																							
<b>Treatment:</b>																																																									
TANK	T01	GALLONS PER DAY OR LITERS PER DAY																																																							
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY																																																							
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR																																																							
OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY																																																							
<div style="display: flex; justify-content: space-between;"><table border="1" style="width: 48%; border-collapse: collapse;"><thead><tr><th>UNIT OF MEASURE</th><th>UNIT OF MEASURE CODE</th></tr></thead><tbody><tr><td>GALLONS</td><td>G</td></tr><tr><td>LITERS</td><td>L</td></tr><tr><td>CUBIC YARDS</td><td>Y</td></tr><tr><td>CUBIC METERS</td><td>C</td></tr><tr><td>GALLONS PER DAY</td><td>U</td></tr></tbody></table><table border="1" style="width: 48%; border-collapse: collapse;"><thead><tr><th>UNIT OF MEASURE</th><th>UNIT OF MEASURE CODE</th></tr></thead><tbody><tr><td>LITERS PER DAY</td><td>V</td></tr><tr><td>TONS PER HOUR</td><td>D</td></tr><tr><td>METRIC TONS PER HOUR</td><td>W</td></tr><tr><td>GALLONS PER HOUR</td><td>E</td></tr><tr><td>LITERS PER HOUR</td><td>H</td></tr></tbody></table><table border="1" style="width: 48%; border-collapse: collapse;"><thead><tr><th>UNIT OF MEASURE</th><th>UNIT OF MEASURE CODE</th></tr></thead><tbody><tr><td>ACRE-FEET</td><td>A</td></tr><tr><td>HECTARE-METER</td><td>F</td></tr><tr><td>ACRES</td><td>B</td></tr><tr><td>HECTARES</td><td>Q</td></tr></tbody></table></div>				UNIT OF MEASURE	UNIT OF MEASURE CODE	GALLONS	G	LITERS	L	CUBIC YARDS	Y	CUBIC METERS	C	GALLONS PER DAY	U	UNIT OF MEASURE	UNIT OF MEASURE CODE	LITERS PER DAY	V	TONS PER HOUR	D	METRIC TONS PER HOUR	W	GALLONS PER HOUR	E	LITERS PER HOUR	H	UNIT OF MEASURE	UNIT OF MEASURE CODE	ACRE-FEET	A	HECTARE-METER	F	ACRES	B	HECTARES	Q																				
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HECTARE-METER	F																																																								
ACRES	B																																																								
HECTARES	Q																																																								
<p><b>EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below):</b> A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.</p>																																																									
<b>DUP</b>																																																									
T/A/C <span style="border: 1px solid black; padding: 2px;">1</span>																																																									
13 14 15																																																									
16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32																																																									
<b>LINE NUMBER</b>																																																									
<b>A. PRO-CESS CODE (from list above)</b>																																																									
<b>B. PROCESS DESIGN CAPACITY</b>																																																									
<b>1. AMOUNT (specify)</b>																																																									
<b>2. UNIT OF MEASURE (enter code)</b>																																																									
<b>FOR OFFICIAL USE ONLY</b>																																																									
<b>LINE NUMBER</b>																																																									
<b>A. PRO-CESS CODE (from list above)</b>																																																									
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16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32																																																									
16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32																																																									

**III. PROCESSES (continued)**

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

**IV. DESCRIPTION OF HAZARDOUS WASTES**

A. **EPA HAZARDOUS WASTE NUMBER** — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. **ESTIMATED ANNUAL QUANTITY** — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. **UNIT OF MEASURE** — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE  
POUNDS . . . . . P  
TONS . . . . . T

METRIC UNIT OF MEASURE CODE  
KILOGRAMS . . . . . K  
METRIC TONS . . . . . M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

**D. PROCESSES****1. PROCESS CODES:**

**For listed hazardous waste:** For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

**For non-listed hazardous wastes:** For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

**Note:** Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

**2. PROCESS DESCRIPTION:** If a code is not listed for a process that will be used, describe the process in the space provided on the form.

**NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER** — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.

2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.

3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

**EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below)** — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO. J-Z	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY												
W 040071107791													W DUP												
IV. DESCRIPTION OF HAZARDOUS WASTES (continued)																									
LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES																					
				1. PROCESS CODES (enter)								2. PROCESS DESCRIPTION (If a code is not entered in D(1))													
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26
1	F001	43	T																						
2	<del>F001</del>	52000	G																						
3	D002	226	T																						
4																									
5																									
6																									
7																									
8																									
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25																									
26																									

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)									
S								T/A	C
F									6

## V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

## VI. PHOTOGRAPHS

All existing facilities must include photographs (*aerial or ground-level*) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (*see instructions for more detail*).

## VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)				LONGITUDE (degrees, minutes, & seconds)			
63	66	57	68	72	74	75	76
		59	71			77	7a


### VIII. FACILITY OWNER

- X** A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.
- B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER															2. PHONE NO. (area code & no.)																					
C																																				
E																																				
15	16														55	56	57	58	59	60	61	62	63	64	65											
3. STREET OR P.O. BOX															4. CITY OR TOWN										5. ST.					6. ZIP CODE						
C																C																				
F																G																				
17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39														

## IX. OWNER CERTIFICATION

*I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.*

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
J. P. Hobe Regional Vice President		11-18-80

### X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
J. P. Hobe	Regional Vice President 	11-18-80

FORM 1 GENERAL		U.S. ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION Consolidated Permits Program (Read the "General Instructions" before starting.)		I. EPA I.D. NUMBER F 0 H D 0 7 1 1 0 7 7 9 1	
LABEL ITEMS		PLEASE PLACE LABEL IN THIS SPACE		GENERAL INSTRUCTIONS	
I. EPA I.D. NUMBER				If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.	
III. FACILITY NAME					
V. FACILITY MAILING ADDRESS					
VI. FACILITY LOCATION					

II. POLLUTANT CHARACTERISTICS	
INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.	
SPECIFIC QUESTIONS	MARK 'X'
	YES NO FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)	<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>
E. Does or will this facility store, use, or dispose of hazardous wastes? (FORM 3)	<input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)	<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)	<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>
B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)	<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>
D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)	<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)	<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)	<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>
J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)	<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>

III. NAME OF FACILITY	
1	SKIP MCKESSON CHEMICAL COMPANY
IV. FACILITY CONTACT	
A. NAME & TITLE (last, first, & title)	
2	GIRMAN ROBERT A MANAGER
B. PHONE (area code & no.)	
216	292 7500
V. FACILITY MAILING ADDRESS	
A. STREET OR P.O. BOX	
3	26601 RICHMOND ROAD
B. CITY OR TOWN	
4	BEDFORD HEIGHTS
C. STATE	
OH	
D. ZIP CODE	
44146	
VI. FACILITY LOCATION	
A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER	
5	26601 RICHMOND ROAD
B. COUNTY NAME	
CUIAHOGA	
C. CITY OR TOWN	
6	BEDFORD HEIGHTS
D. STATE	
OH	
E. ZIP CODE	
44146	
F. COUNTY CODE (if known)	

## VII. SIC CODES (4-digit, in order of priority)

A. FIRST				B. SECOND			
C	7	5	1	C	7		
13	14	15	16	13	14	15	16
(specify) Distributor				(specify)			
C. THIRD				D. FOURTH			
C	7			C	7		
13	14	15	16	13	14	15	16
(specify)				(specify)			

## VIII. OPERATOR INFORMATION

A. NAME																								B. Is the name listed in Item VIII-A also the owner?			
C	FOREMOST - MCKESSON CHEMICAL COMPANY																						<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO				
13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)																								D. PHONE (area code & no.)			
F = FEDERAL    M = PUBLIC (other than federal or state) S = STATE      O = OTHER (specify) P = PRIVATE																								415 983 8300			
E. STREET OR P.O. BOX																											
ONE POST STREET																											
F. CITY OR TOWN																											
SAN FRANCISCO																											
G. STATE																											
CA																											
H. ZIP CODE																											
94104																											
IX. INDIAN LAND																											
Is the facility located on Indian lands?																											
<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO																											

## X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)												D. PSD (Air Emissions from Proposed Sources)															
C	T	I										C	T	I													
9	N											9	P														
13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40
B. UIC (Underground Injection of Fluids)												E. OTHER (specify)															
C	T	I										C	T	I													
9	U											9															
13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40
C. RCRA (Hazardous Wastes)												E. OTHER (specify)															
C	T	I										C	T	I													
9	R											9															
13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40

## XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

## XII. NATURE OF BUSINESS (provide a brief description)

We are primarily a nationwide distributor of chemicals at this branch. Some of the materials are subdivided into smaller size containers before being distributed to a customer by our branch.

## XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
M.A. Minor Regional Vice President	<i>m.a. minor</i>	9/9/81

## COMMENTS FOR OFFICIAL USE ONLY

C																																							
C																																							
13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40												

CONTINUE ON REVERSE

**III. PROCESSES (continued)**

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

**IV. DESCRIPTION OF HAZARDOUS WASTES**

**A. EPA HAZARDOUS WASTE NUMBER** — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

**B. ESTIMATED ANNUAL QUANTITY** — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

**C. UNIT OF MEASURE** — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS.....	P	KILOGRAMS.....	K
TONS.....	T	METRIC TONS.....	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

**D. PROCESSES****1. PROCESS CODES:**

**For listed hazardous waste:** For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

**For non-listed hazardous wastes:** For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

**Note:** Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

**2. PROCESS DESCRIPTION:** If a code is not listed for a process that will be used, describe the process in the space provided on the form.

**NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER** — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

**EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below)** — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

Continued from page 2.

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)															FOR OFFICIAL USE ONLY									
<div> <div>S</div> <div>W</div> <div>0</div> <div>H</div> <div>D</div> <div>0</div> <div>7</div> <div>1</div> <div>1</div> <div>0</div> <div>7</div> <div>7</div> <div>9</div> <div>1</div> <div>T/A/C</div> <div>1</div> </div>															<div> <div>S</div> <div>W</div> <div>DUP</div> <div>T/A/C</div> <div>2</div> <div>DUP</div> </div>									
1 2 13 14 15															1 2 13 14 15 23 24 25 26									
IV. DESCRIPTION OF HAZARDOUS WASTES (continued)																								
LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES																				
				1. PROCESS CODES (enter)								2. PROCESS DESCRIPTION (if a code is not entered in D(1))												
1	F 0 0 1	635,000	P	S	0	1																		
2	F 0 0 2	80,000	P	S	0	1																		
3	F 0 0 3	120,000	P	S	0	1																		
4	F 0 0 4	150,000	P	S	0	1																		
5	F 0 0 5	50,000	P	S	0	1																		
6																								
7																								
8																								
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21																								
22																								
23																								
24																								
25																								
26																								

## IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

F 0 H D 0 7 1 1 0 7 7 9 1 6

## V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

## VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

## VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, &amp; seconds)

41 24 45

LONGITUDE (degrees, minutes, &amp; seconds)

81 29 01

## VIII. FACILITY OWNER

☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code &amp; no.)

E Bankers Trust Company, AS TRUSTEE

212-850-2392

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

F Church Street Station P. O. Box 1980

G New York

N Y

10008

## IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

HENRY A. ZARZICKI  
ASSISTANT VICE PRESIDENT

B. SIGNATURE

C. DATE SIGNED

2-25-82

## X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

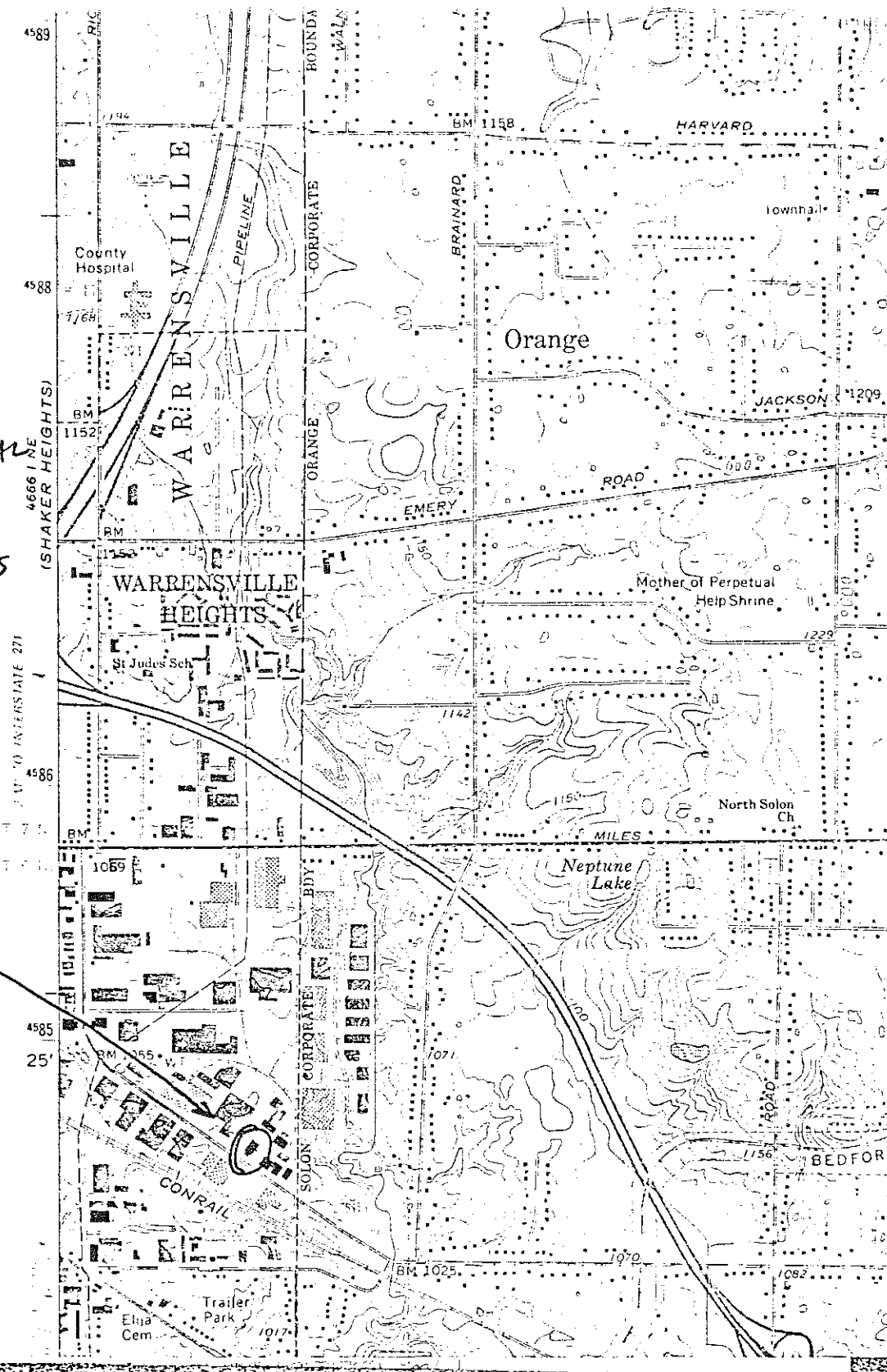
A. NAME (print or type)

M. A. Minor  
Regional Vice President

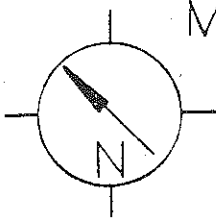
B. SIGNATURE

C. DATE SIGNED

McKesson Chemich  
Co  
BEDFORD HEIGHTS  
OHIO  
BRANCH



# McKESSON CHEMICAL Co. CLEVELAND, OHIO



245'

Corrosive  
Repack  
Bldg.

CORROSIVE  
DIKE

Solvent  
Repack  
Bldg.

SOLVENT  
DIKE

WASTE DRUM STORAGE

RAMP

10'  
30'

COVERED  
PLATFORM

116'

154'

RAIL SPUR

OFFICE  
35'x76'8"

PARKING AREA

LAWN

LAWN

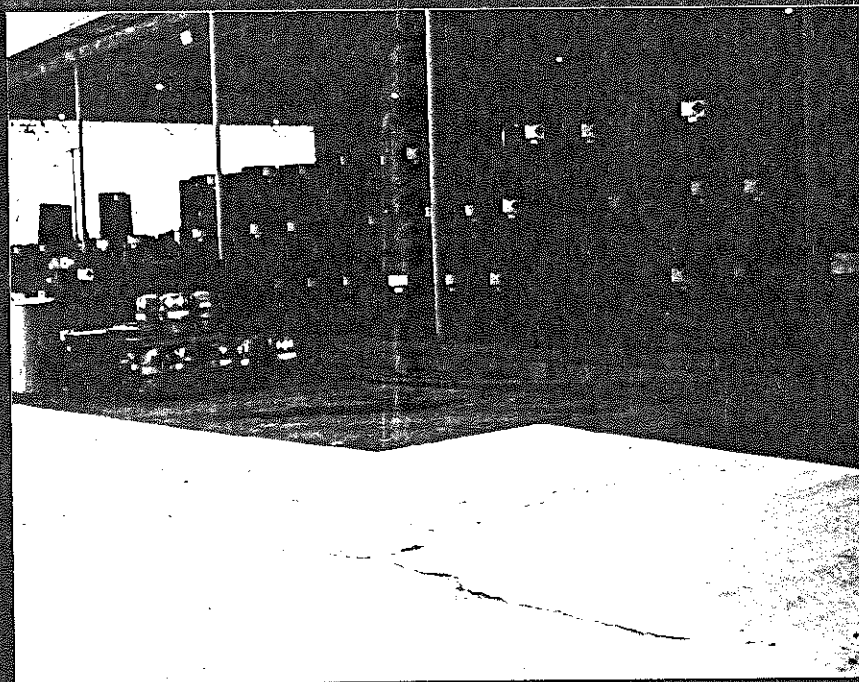
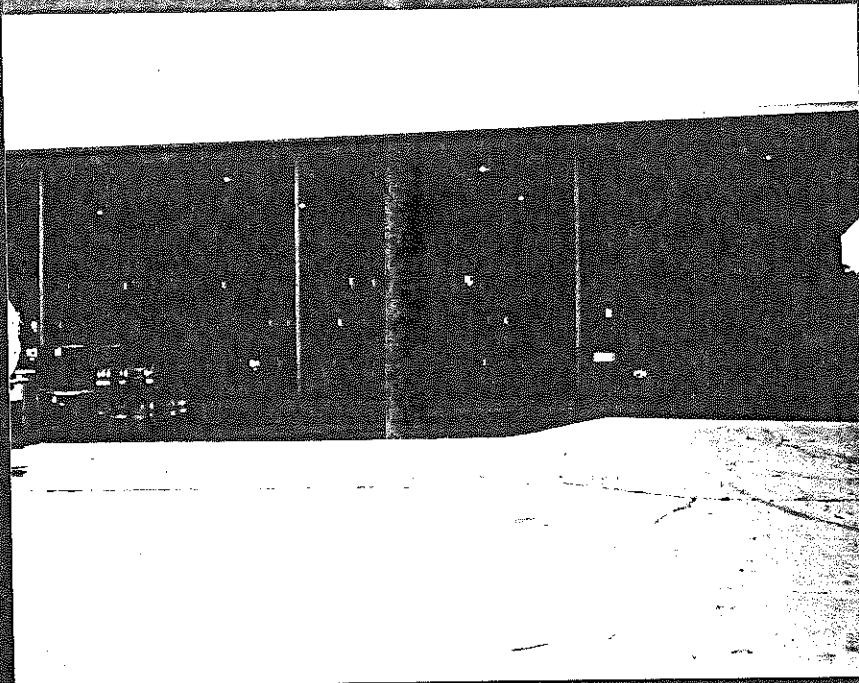
PROPERTY LINE

SCALE  
1"=50'

RICHMOND RD

McKesson Chemical Company  
Bedford Heights (Cleveland), Ohio Branch

Proposed location of drums of spent  
solvent.





McKesson Chemical Company

General Description of Facility

(40 CFR Sec. 122.25(a)(1))

McKesson Chemical Company, a division of Foremost-McKesson, Incorporated, a Maryland Corporation, based in San Francisco, California at One Post Street, leases and operates a distributing facility in the City of Bedford Heights, Ohio, located at 26601 Richmond Road. The legal description of its location is as follows:

"Situated in the City of Bedford Heights, County of Cuyahoga and State of Ohio, being a part of Original Lot No. 20 in Bedford Township, bounded and described as follows:

Beginning at a point in the Northerly line of Richmond Road, 50 feet wide, distant 969.61 feet as measured along said Northerly line of Richmond Road from its intersection with the Easterly line of the Village of Bedford Heights, said point being the Southeasterly corner of land conveyed or about to be conveyed to Arrow Sash, Doors & Plywood, Inc.

(1) Thence North  $36^{\circ} 03' 07''$  East along the Easterly line of land conveyed or about to be conveyed as aforesaid, 450 feet;

(2) Thence South  $53^{\circ} 56' 53''$  East, parallel to Richmond Road, 245 feet to the West line of lands conveyed by deed from Erie Land and Improvement Company of Pennsylvania to Larry Davis, recorded in Volume 10131, at Page 46 of Cuyahoga County Deed Records;

(3) Thence South  $36^{\circ} 03' 07''$  West, along said Westerly line of lands conveyed as aforesaid to Larry Davis, 450 feet to said

Northerly line of Richmond Road;

(4) Thence North 53° 56' 53" West, along said Northerly line of Richmond Road, 245 feet to the point or place of beginning, containing 2.531 acres more or less, but subject to all legal highways."

McKesson Chemical Company is a nationwide distributor of various industrial chemicals. McKesson Envirosystems, another division of the Foremost-McKesson family, operates a number of recycling plants across the country and functions as a natural partner to the distribution network which McKesson Chemical Company maintains.

The recycling of spent solvents is but one of the services McKesson offers to its customers. Many customers who employ our reclaiming services are those who purchased the virgin product from us in the first place. In this manner, McKesson Chemical Company provides a means for our customers to properly manage their wastes and to conserve resources.

The facility in Bedford Heights consists of a masonry, steel-framed building of approximately 20,500 square feet. Of this total area, approximately 2,700 square feet is office and the remainder is warehouse storage. The area designated and designed for hazardous waste storage consists of 300 square feet, measuring 10 feet by 30 feet, located in the outside yard area adjacent to the building, accessible from the building for forklift handling of drums from the dock unloading area by means of a concrete ramp. Overall yard area is about 110,000 square

feet, of which approximately 86,000 square feet is fenced in.

This facility will be utilized by McKesson Chemical Company as a temporary storage facility for various chemical solvents destined for recycling. The operation followed is one of picking up a customer's (generator's) spent materials, bringing the material back to the McKesson facility, and placing it into temporary storage until a full truckload of various customer's materials are accumulated, and then reshipping the materials to the recycling center. The containers in which these spent materials are shipped to our facility are of a 55 gallon capacity meeting all DOT specifications for the material being shipped in them. All materials are received, stored, and reshipped in the same container.

The designated storage area for waste materials is to be a bermed rectangle of concrete, 10 feet by 30 feet by 6 inches. The entire outside storage area lying adjacent to the building is surrounded by a 6 foot high chain link fence with the top arms of posts being set at a 45 degree angle from vertical and holding 3 strands of barbed wire extending 1 foot above the top of the chain link fencing.

All movements and handling of materials designated as hazardous wastes at the facility shall be undertaken in accordance with operational plans as outlined in this application. No treatment, processing, or disposal of hazardous wastes will take place at this location.

Experience at other branches handling these types of spent solvent streams  
Indicate the following types of industries are served:

Metalworking: A wide variety of metalworking and machinery  
manufacture operations require a final degreasing step in  
order to remove lubricating oil, etc.: lathing, grinding,  
cutting, stamping. The chlorinated solvents are the work-  
horses of this business.

Electronic: Circuit boards commonly require a de-oiling  
step to remove lubricants, solder fluxes, etc. Although  
the chlorinated solvents are effective, the fluorinated  
counterparts are generally preferred.

Ink, Adhesives: A wide variety of oxygen — containing  
solvents are used in cleaning out mixing vats, printing  
rolls, transfer containers, piping, etc.

Other Industries from which spent solvent streams have been  
obtained include pharmaceutical, photographic, electrical,  
textiles, rubber, and plastics.

An engineering drawing of this facility's physical layout, certified by  
an Ohio — licensed engineer, follows.

This plan, dating from the time of construction of the facility, locates the active drains to the storm sewer. The 18 inch square trench drain between the two tank areas has been paved over. The proposed hazardous waste storage area is located on a high point of the yard. Essentially the entire yard is now paved with concrete, eight inches thick, with enough load-bearing capacity to handle trucks with 80,000 lbs. gross weight.

There are no injection or withdrawal wells on the property. There are no flood controls, run-off controls, or drainage carriers other than the stormwater drainage system and ditches noted on the plot plan. Fire controls (Fire hydrants) are noted on the plan.

122.25(a) (2).

McKesson Chemical Company

Chemical and Physical Analyses

(40 CFR Sec. 122.25(a)(2) & 264.13(a))

McKesson Chemical Company and McKesson EnviroSystems, its sister recycling division, requires all generators who wish to employ the Company's services to provide data regarding the chemical make-up of the generators' waste stream before pick-up of the material is initiated.

Both the McKesson branch storing spent solvents, and the respective McKesson EnviroSystems facility which will recycle the material, shall be provided appropriate data from the information furnished by the customer (generator), which will have been reviewed and evaluated by the technically trained people at the Fort Wayne, Indiana, headquarters of McKesson EnviroSystems.

A full description of the procedures and sequence of events pertaining to the accumulation of data and analytical information made available and kept on file at the storage facility before approval to accept materials, is outlined in the Waste Analysis Plan in the next Section. This procedure describes fully the operation followed in developing and disseminating the necessary information to assure that all facilities handling the material have adequate information available to properly manage a given waste stream.

McKesson Chemical Company shall provide to off-site generators wishing to utilize its services any requested proof of appropriate permits to be allowed to handle their particular waste streams. Generators shall also be offered the opportunity to take a tour of any company facility, as well as the actual recycling plants, to allow them an opportunity to assure themselves of compliance of these facilities.

McKesson Chemical Company

Waste Analyses Plan

- (A) General - No spent solvent will be transported to the branch unless and until it is determined to be economically recoverable. To this end, a representative sample of each stream being considered is assayed for content of the specific solvent involved as well as contaminants which might preclude its regeneration. These analyses are carried out in the laboratories of McKesson EnviroSystems; only after such analyses are evaluated is clearance given for picking up of the stream at the customer's location for transport to the appropriate McKesson branch. Every stream - every potential shipment - follows this procedure. If analyses are unacceptable, no waste stream is picked up.
- (B) Waste Analyses Plan - Once this information is obtained, a McKesson driver will be given a pick-up order against which to match the hazardous waste manifest prepared by the generator (customer). On arrival at the branch, this delivery will be checked against the quantity and quality established for that single transaction.

Spent Solvent Analysis

<u>Parameters Evaluated</u>	<u>Test Method</u>	<u>Purpose</u>
Assay	Gas Chromatograph	Confirm I.D. of major recoverable content
Specific Gravity	Specific gravity balance	Calculation of the lbs/gal.
Water	Karl Fischer Apparatus	Possible contamination by moisture
Flash Point	Closed Cup ASTM D56 or D93	Flammability danger
% Chlorine	Parr Bomb	Some customers request less than 3% chlorine
pH	pH Meter	Danger of corrosion

Sampling Procedures

1. Reference Material

- A. Current Material Safety Data Sheets.
- B. Current Product Technical Bulletin from Supplier.

2. Safety Equipment as Required

- A. Gloves
- B. Eye Protection
- C. Rubber Apron, Boots
- D. Mask or Adequate Ventilation.

3. Sample Containers

- A. For most products, eight fluid ounces narrow or wide mouth glass bottles with molded screw cap plastic tops protected with polyethylene inner cap liner or aluminum foil. Both types should be available to cope with liquids of differing viscosities.
- B. Flammables should be poured after sampling into a one pint galvanized metal can with metal lid.
- C. Sample bottles must not be filled liquid full; sufficient vapor space must be left to allow for thermal expansion.

4. Sampling Device

In most cases any inert clean weighted thief (sampler) (dip basket) equipped with an inert wire, rod, or chain will suffice. Where any question exists on inertness of a sampling device or container, consult the technical

data sheet obtained from the supplier of the chemical for guidance.

5. Personnel

The immediate supervisor, foreman, or the person doing the sampling must establish that the employee has a satisfactory understanding of the procedure to be used and the basic safety consideration. These include key physical and physiological properties of the product and emergency procedures required should an accident occur.

6. Labeling of the Sample

A permanent type label should be used. It should be large enough to permit placement of legible information as follows:

Product - Grade

Source

Outdate - (of sample) Month Date Year

Initial of person doing the sampling.

Wastes To Be Handled In Drums At Facility

McKesson Chemical Company

<u>Chemical</u>	<u>Hazard</u>	<u>Basis For Hazard Designation</u>
Tetrachloroethylene	Toxic	Listed waste F001, F002
Trichloroethylene	Toxic	Listed waste F001, F002
Methylene chloride	Toxic	Listed waste F001, F002
1,1,1 - Trichloroethane	Toxic	Listed waste F001, F002
Carbon tetrachloride	Toxic	Listed waste F001
Chlorinated fluorocarbons	Toxic	Listed waste F001, F002
Chlorobenzene	Toxic	Listed waste F002
O - Dichlorobenzene	Toxic	Listed waste F002
Xylene	Ignitable	Listed waste F003
Acetone	Ignitable	Listed waste F003
Ethyl acetate	Ignitable	Listed waste F003
Ethylbenzene	Ignitable	Listed waste F003
Ethyl ether	Ignitable	Listed waste F003
Methyl isobutyl ketone	Ignitable	Listed waste F003
n - Butyl alcohol	Ignitable	Listed waste F003
Cyclohexanone	Ignitable	Listed waste F003
Methanol	Ignitable	Listed waste F003
Cresols	Toxic, Ignitable	Listed waste F004
Cresylic acid	Toxic, Ignitable	Listed waste F004
Nitrobenzene	Toxic, Ignitable	Listed waste F004
Toluene	Toxic, Ignitable	Listed waste F005
Methyl ethyl ketone	Toxic, Ignitable	Listed waste F005
Carbon disulfide	Toxic, Ignitable	Listed waste F005
Isobutanol	Toxic, Ignitable	Listed waste F005
Pyridine	Toxic, Ignitable	Listed waste F005

122.25(a)(3)

McKesson Chemical Company

Waste Analysis and Verification Procedures

(40 CFR Sec. 122.25(a)(3))

The following pages describes the standard Waste Analysis and Verification Procedures now in effect at those McKesson Chemical branches already permitted in the storage of hazardous wastes.

## WASTE ANALYSIS AND VERIFICATION PROCEDURES

### McKesson Chemical Company

1. Upon initial contact from a prospective customer who wishes to employ McKesson Chemical Company and McKesson EnviroSystems' services to re-cycle a spent stream, a McKesson representative is either sent to the customer's location or makes contact with him to acquire a prepared Spent Material/Waste Product Survey form (copy attached along with preparation instructions). McKesson strongly urges the customer (who is the generator) to provide us with a physical and chemical analysis which he has either performed or has obtained from an outside laboratory.
2. The completed Spent Material/Waste Product Survey form and any laboratory physical and chemical analysis are returned to the respective branch which will be handling the generator's waste stream. A copy of the survey and any analyses are kept on file at the branch facility, while the original is mailed to McKesson EnviroSystems, headquartered in Fort Wayne, Indiana, along with copies of any laboratory analysis.
3. McKesson EnviroSystems will evaluate the data contained on the Spent Material/Waste Product Survey form and the analytical reports on the waste stream and determine if the recycling facility has sufficient information to properly manage the material. A sample may be required by McKesson EnviroSystems before a decision is made as to whether to accept a particular waste stream and, if so, copies of the laboratory reports are forwarded to the McKesson Chemical branch facility before the material is picked up.
4. Once McKesson EnviroSystems has made a determination that sufficient knowledge of a particular waste stream is on hand, and approval is given by the Environmental Engineer, Marketing Manager, and Corporate Manager of Refinery Operations, the McKesson branch is notified.

5. With this approval on hand, the McKesson branch will notify the generator that the branch is authorized to pick up the material in accordance with the following procedure:

- A. The generator completes an appropriate Hazardous Waste Manifest based on the Survey form and accompanying analytical data.
- B. A copy of the Manifest is supplied to the local McKesson branch and is checked.
- C. A copy of the Manifest, after its approval by Branch Management, is given to the truck driver and is to be in his possession until delivery of the material to the branch.
- D. The material to be picked up is compared to the listing on the Manifest by the driver. In addition, he:
  - a. Evaluates the container for condition - sealed, with no apparent leaks.
  - b. Locates the precautionary warning label, if required.
  - c. Ensures that no other labelling or stencilling is on the container other than the Hazardous Waste label, including trademarks, original vendor names, and the like.

E. The driver also makes sure the Hazardous Waste Label on the drum is complete:

- a. Generator name and address.
- b. Contents.
- c. Manifest number.
- d. Proper shipping name.
- e. E.P.A. ID number.
- f. Accumulation starting date.

F. The driver picks up only that quantity and class of hazardous waste appearing on the Manifest.

6. Upon notice to McKesson EnviroSystems that a McKesson Chemical branch requires pick up of an accumulated load of spent material, McKesson EnviroSystems' headquarters in Fort Wayne, simultaneously forwards a copy of all data accumulated on a particular waste stream to the respective recycling facility for review and filing at that location so that this information is available before actual receipt of the waste stream.
7. At the time a shipment is received at the recycling facility, a measurement and recording of the volume received of a particular generator's stream is made. Verification is made that the count contained on the accompanying shipment manifest document corresponds to the number of containers received and that the lot numbers assigned by the McKesson Chemical branch handling (storing) the spent stream are accurate. A sample is drawn from the various drum utilizing a sampling tube which will ensure a homogeneous (cross section) representation according to the following schedule:

7. cont'd.

- a. For ten or less drums in a particular generator's lot of a given product, all drums are sampled.
- b. For more than ten drums in a particular generator's lot of a given product, a statistical sampling of 40% of all drums, but not less than ten drums, is taken.

The container samples are then taken and an aliquot representation is composited for analytical verification. The sample taken at the re-cycling facility is labelled and identified with the following information:

- a. The manifest number.
- b. The generator's E.P.A. identification number.
- c. The proper D.O.T. shipping name as it appears on the hazardous waste label on the drum.
- d. The E.P.A. hazardous waste code as it appears on the hazardous waste label on the drum.
- e. The date on which the shipment is received.
- f. The initials of the individual who took and composited the sample.

The drums are held in a specially designated and contained storage area where they are segregated according to generator and waste identification until the lab verification results are returned.

8. The composite sample of the received containers is taken to the on-site lab where gas chromatographic analysis is performed to ensure that the material is in fact one and the same as the description on the Spent Material/Waste Product Survey form, the manifest, the drum label, and any

lab reports which the generator may have provided. Based upon the results of the chromatographic analysis, further tests will be conducted as warranted. Once verification is made, the approval is given by the Plant Manager, or that individual's designee, for movement of the drums into the processing area.

9. Should a discrepancy become apparent during the verification analysis, the recycling center will contact the McKesson Chemical branch who will in turn contact the generator to inform him of the discrepancy. Based upon the findings of the lab and the contact with the original generator, the shipment of the material having the evidence of a discrepancy may be refused, or an alternate means of handling the shipment will be arranged with the original generator.
10. A copy of the gas chromatographic analysis is returned to the McKesson Chemical branch which was temporarily storing a generator's spent material. This copy is placed into the customer's file (original generator), which also contains a copy of the original Spent Material/Waste Product Survey form, any laboratory analytical reports, and any and all correspondence between any of the parties involved regarding that particular generator's waste stream.

The net result of the preceding is that all shipments of recyclable materials sent to one of the recycling facilities are verified by the latter before they are processed. This step not only verifies the economic value of the spent stream but prevents damage to the equipment and hazard to personnel due to unexpected ingredients in the solvent.

Section 1. General

Complete company name, address and zip code.

If generating plant is in a different location, please note.

Omit Product Code.

Section 2. Marketing

The accurate completion of this section has a direct effect on:

A. Pricing

B. Method of pick up

C. The decision as to where the spent material will be processed.

D. The request for a sample.

Section 3. Physical Properties

Complete to your best ability

If the generator has any other analysis i.e. WR&R or Independent laboratory, please attach.

Section 4. Hazardous Properties

Under RCRA hazardous waste will meet 4 basic properties:

A. Ignitable Flash Point  $\leq 140^{\circ}\text{F}$  Actives, Hydrocarbons, Lacquer Thinners, and blends of these solvents.

B. Toxic Chlorinated and Fluorocarbons

C. Corrosive Acids, Caustics, PH  $\leq 2$  or  $> 12.5$

D. Reactive TNT Waste water, Sodium Metal

Describe the property relative to the waste stream.

Section 5. EPA-DOT Identification

EPA hazardous waste numbers can be found by using the attached listing. (Taken from CFR #40, 5-19-80)

Hazard codes describing the waste's properties listed in Section 4 can be found on the same listing.

DOT hazardous material descriptions in addition to their hazard class and identification (UN or NA) numbers are found in the Hazardous Materials Table 5-22-80. A copy of this table should be on file at each McKesson branch.

Section 6. Chemical Composition

The basic components of the waste should be listed in this section along with their percentages of composition.

Again any other analysis reports on the stream should be attached.

Section 7. General

Any other information relative to the stream, or customer specifications on reclaimed and returned material, ie. drying, addition of virgin material, packaging should be listed here.

Section 8. The generator must sign this survey form. Failure to do so will cause immediate rejection by McKesson Envirosystems. Phone number, date filed, and federal EPA I.D. number must also be completed.

McKesson Envirosystems Co.  
127 West Berry Street  
200 Commerce Building  
Fort Wayne, IN 46802  
219 424-1940



# Spent Material / Waste Products Survey

FOR OFFICE  
USE ONLY

Please provide all information requested below,  
then return this form to your local McKesson Chemical Representative.

COMPANY <div>1</div>				SIC NUMBER			
MAILING ADDRESS <div>1</div>				PRODUCT CODE			
DESCRIPTION OF SPENT MATERIAL / WASTE PRODUCT <div>2</div>				INDICATE PROCESS WHICH GENERATES THIS SPENT / WASTE (BE SPECIFIC)			
VOLUME		FREQUENCY		PACKING			
		<div>PER MONTH</div> <div>PER YEAR</div> <div>ONE TIME</div>		<div>IN DRUMS</div> <div>IN BULK</div>			
PHYSICAL PROPERTIES: PHYSICAL STATE AT 70°F <div>3</div>		(DATE OF LAB ANALYSIS _____)		HAZARDOUS PROPERTIES: DESCRIBE— <div>4</div>			
SOLID _____		LIQUID _____		FLASH POINT _____			
SEMI-SOLID _____		PH _____					
SPECIFIC GRAVITY _____		% CHLORINE _____					
% SULFUR _____		BTU PER LB/GAL _____					
EPA / DOT IDENTIFICATION: EPA HAZARDOUS WASTE NUMBERS <div>5</div> EPA HAZARD CODES _____ DOT HAZARDOUS MATERIAL DESCRIPTION _____							
CHEMICAL COMPOSITION:							
SUBSTANCE	MIN	MAX	TYP	SUBSTANCE	MIN	MAX	TYP
<div>6</div>							
GENERAL: 1. PLEASE PROVIDE LAB ANALYSIS IF HEAVY METALS, CYANIDES, PESTICIDES, CARCINOGENS OR OTHER TOXICS ARE INVOLVED. 2. PLEASE DISCUSS ANY OTHER INFORMATION WHICH MAY HELP MCKESSON BE OF SERVICE: <div>7</div>							
PLEASE ATTACH ANY ADDITIONAL HAZARD AND HANDLING INFORMATION TO THIS SHEET.							
TO THE BEST OF MY KNOWLEDGE AND ABILITY TO DETERMINE THIS IS A COMPLETE AND ACCURATE DESCRIPTION OF THIS MATERIAL.							
SIGNATURE <div>8</div>				TITLE			
PHONE NUMBER (INCLUDE AREA CODE)				DATE		EPA IDENTIFICATION NO.	

McKesson Branch \_\_\_\_\_ and Salesman \_\_\_\_\_

Salesman Remarks: \_\_\_\_\_

Fort Wayne Review \_\_\_\_\_ Environmental \_\_\_\_\_ Transportation \_\_\_\_\_ Manufacturing \_\_\_\_\_  
Marketing \_\_\_\_\_ Other \_\_\_\_\_

**RESULTS OF FORT WAYNE REVIEW:**

- ☐ Stream Approved, no sample required. McKesson salesman and branch should start arrangements for routine pick up of material.
- ☐ Stream approved for plant evaluation. McKesson salesman should arrange for sample to be sent UPS to  
☐ Newark ☐ New Castle ☐ Dolton ☐ Other \_\_\_\_\_
- ☐ Stream not approved for reasons noted. McKesson salesman should inform customer. \_\_\_\_\_
- ☐ Additional information is needed as follows: \_\_\_\_\_
- ☐ Sample received and evaluated. ☐ Final Approval ☐ Not Approved

**Price Information: Freight and Hauling, Disposal Charges, Toll Recycle., Etc.**

**Close the Deal Follow Up:**

- ☐ Deal reported closed on (date) \_\_\_\_\_ by \_\_\_\_\_
- ☐ First load scheduled for pick up on \_\_\_\_\_ by \_\_\_\_\_  
with material going to \_\_\_\_\_

**Notes:** \_\_\_\_\_

McKesson Chemical Company

Waste Analysis Plan

(40 CFR Sec. 122.25(a)(3))

This facility of McKesson Chemical Company is seeking a permit to function simply as a short-term (probably less than a month) storage facility for a limited variety of spent organic solvents. These will be handled only in DOT-approved drums, and will usually have been picked up in small numbers from customers who had previously purchased the virgin material. Once a sufficient number of drums have been accumulated at the facility to make transport economically feasible they will be moved out-of-state for re-claiming (either New Jersey or Kentucky).

Each branch of McKesson Chemical Company organizationally is a financial entity unto itself — in other words, it is a small chemical business. Typical of such small chemical distributorships, which carry out no manufacturing processes, the branch has no laboratory facilities. It would be uneconomic and financially impossible to have technical personnel and to equip a laboratory for the limited amount of material being handled. Even the cost of outside analytical work would be prohibitive, especially in view of the fact that such analytical work would duplicate the effort subsequently carried out by the McKesson recycling facility.

On the other hand, the purpose of a profitable reclaiming business is thwarted unless the constituents of the spent solvent stream being handled are known accurately. To this end the McKesson reclaiming facilities in New Castle, Kentucky, and Newark, New Jersey, (McKesson Envirosystems Company) maintain and operate a sophisticated analytical laboratory. Consequently, a McKesson distributor branch is assured of knowing exactly the content of each spent

solvent stream being proffered by a customer (generator). A sample of a proffered stream of uncertain content is sent to New Castle or to Newark for analysis; in addition, a Spent Material/Waste Products Survey form (most recent revision appended) is prepared by the customer in connection with each proffered stream, and a copy of a formal chemical analysis is requested of the customer. Both are filed at the branch. The procedure followed is detailed in the accompanying Waste Analysis and Verification Procedure.

McKesson has an established policy that requires each customer to certify that recyclable solvents proffered to McKesson are only listed wastes (F001 through F005), and that they do not contain unacceptable materials. These unacceptable materials include such items as pesticides, known and suspected carcinogens, radioactive materials and poisons. With these restrictions, it is felt unnecessary to test for these products, although, if they were, the procedures outlined in Publication SW-846, "Test Methods for Evaluating Solid Waste" would be followed. The customer does provide assays of his listed wastes, usually including the process from which it derived (McKesson invariably knows the latter anyway because of its basic sales relationship with the customer). It should be noted McKesson has records of ongoing chemical and physical analyses of existing customers' materials resulting from its own analytical work at the recycling center.

In addition, all materials leaving the branch for recycling are shipped in the same container in which they arrived (unless, of course, container damage mandated a transfer).

Despite the reliance on another McKesson facility for actual chemical and physical analyses of the spent streams this McKesson branch handles, the branch recognizes its responsibility to inspect the drums received (264.13). As noted earlier, the branch has records of testing of products supplied previously by existing customers, and drums of spent solvent as they arrive are checked against manifest data which, in turn, are based on assay and analyses carried out previously by the laboratory of the recycling center. These inspections by the receiving branch's personnel are logged in accordance with the Inspection Schedule (122.25(5)).

A word is in order regarding parameters that are measured in order to handle the spent streams safely and to assure their economic potential:

<u>PARAMETER</u>	<u>TEST METHOD</u>	<u>PURPOSE</u>
Assay	Gas Chromatograph	To confirm identity and amount of recoverable component(s).
Specific Gravity	Balance	Useful in product identity; permits conversion of volume to weight.
Water	Karl Fischer Apparatus	Possible contamination.
Flash Point	Closed cup ASTM D56 or D93	Flammability danger.
pH	pH Meter	Danger of corrosion.

It should be noted that in many cases knowledge of exact compositions are not required — only that flammability is tested and that the product matches what was manifested. This reflects the fact that in taking a spent solvent from a customer and cleaning it by distillation, the subsequent product is usually sold by physical characteristics — not by chemical structure. Thus, in order to transport, store, and distill such spent material only a minimum of information about its makeup is required.

The McKesson recycling facility and its predecessor organization has been carrying out these analyses for about twenty years, and is therefore competent in the techniques of sampling — the taking of representative samples. Each recycling facility is extremely careful to know exactly what it is handling in order to prevent damage to its equipment (as from corrosion) and to prevent accidents (such as would result from inadvertent handling equitable materials).

All analyses required for characterization of a hazardous waste stream from a McKesson Chemical branch carried out by a McKesson Envirosystems laboratory — and subsequently filed at the McKesson Chemical branch — follow the analytical procedures defined in SW-846, "Test Methods for Evaluating Solid Waste".

Obviously, knowing the customer — the waste generator — is an important element of this process. The following page is an internal McKesson document depicting the sequence of approvals by McKesson management personnel prior to acceptance of spent streams from that generator.

WASTES EXPECTED TO BE HANDLED IN DRUMS AT FACILITY

MCKESSON CHEMICAL COMPANY

<u>CHEMICAL</u>	<u>HAZARD</u>	<u>BASIS FOR HAZARD DESIGNATION</u>
Tetrachloroethylene	Toxic	Listed waste F001, F002
Trichloroethylene	Toxic	Listed waste F001, F002
Methylene Chloride	Toxic	Listed waste F001, F002
1,1,1 Trichloroethane	Toxic	Listed waste F001, F002
Carbon Tetrachloride	Toxic	Listed waste F001
Chlorinated Fluorocarbons	Toxic	Listed waste F001, F002
Xylene	Ignitable	Listed waste F003
Acetone	Ignitable	Listed waste F003
Ethyl Acetate	Ignitable	Listed waste F003
Ethylbenzene	Ignitable	Listed waste F003
Methyl Isobutyl Ketone	Ignitable	Listed waste F003
n - Butyl Alcohol	Ignitable	Listed waste F003
Cyclohexanone	Ignitable	Listed waste F003
Methanol	Ignitable	Listed waste F003
Toluene	Toxic, Ignitable	Listed waste F005
Methyl Ethyl Ketone	Toxic, Ignitable	Listed waste F005
Isobutanol	Toxic, Ignitable	Listed waste F005

# WASTE GENERATOR APPROVAL

**McKESSON  
CHEMICAL**

Foremost-McKesson  
Chemical Group

McKesson Chemical Company

<b>Vendor Information</b>		
To: <b>Marketing &amp; Product Management Home Office</b>	From:	Date
		Region
Vendor Name		
Address		
City, State, Zip Code		
Telephone Number	Contact	
Request originated by		Date
Branch:		
<b>Approvals</b>		
Approved Yes <input type="checkbox"/> No <input type="checkbox"/>	District Manager	Date
Approved Yes <input type="checkbox"/> No <input type="checkbox"/>	Regional Mktg. & Prod. Manager	Date
Approved Yes <input type="checkbox"/> No <input type="checkbox"/>	Regional Vice President	Date
Approved Yes <input type="checkbox"/> No <input type="checkbox"/>	Vice President, Mktg. & Prod. Management	Date

122.25(a) (4)

McKesson Chemical Company

Security

(40 CFR Sec. 122.25(a)(4), 264.14)

This McKesson Chemical Company facility employs a number of measures designed to assure adequate security in order to comply with government regulations and to assure the protection of Company assets.

This facility does not utilize a 24-hour entry surveillance system, but does have other means of control to provide adequate security. A fully automatic and monitored 24-hour fire alarm system is present at the facility.

The entire facility including the outside yard storage area, in which the designated waste storage area is included is maintained in a secure manner. As will be observed from the facility diagram, the building walls act as a barrier on the north side of the complex. On the east wall at the end of the building, fencing begins and surrounds the entire yard and truck dock and loading/unloading area until meeting up with the southwest corner of the building.

The fencing utilized to surround the outside areas of the facility where storage and loading/unloading activities are undertaken, is constructed of a 6 foot high, fabric type 11 gauge, 2 inch mesh chain link fence. Above the mesh fencing, supported on the top of the steep upright posts, are arms projecting 1 foot at a 45 degree angle from vertical, and holding 3 strands of barbed wire strung around the entire fence.

Access to the areas of the facility which are surrounded by the fence will be by means of one of two gates. Vehicle traffic may gain access to the loading/unloading dock area by way of a 24 foot gate constructed of similar materials as the fixed fencing previously described. This access is in

the western stretch of fence located to the South side of the building. The other access point through the fence consists of a 3 foot gate of similar construction to accomodate the rail entry. This gate is located on the eastern stretch of fence.

Both of the above mentioned gates are maintained in a closed and padlocked condition during all periods of facility non-working hours. During working hours, the fence gates are capable of being observed at all times from the general office. All visitors must gain access to the facility by way of the main office located on the northern side of the facility. A secured and attended vestibule area lies immediately inside the entrance door at which point a receptionist shall inquire as to the individual's identification and purpose of visit. While within the facility, it is McKesson Chemical Company's policy that no one shall be allowed to gain access to any part of the immediate facility without having a McKesson employee accompanying them at all times. Any visits and/or inspections which may be pertinent to the functioning of the facility as a hazardous waste management facility, are to be logged in the facility's operating log.

All doors, as well as gates which were previously described, are maintained in a locked and secured condition during non-working hours.

Warning signs are posted at all fence gates and several other fence locations around the facility in such a manner to be visible from all angles of approach, and shall bear the legend "Danger-Unauthorized Personnel Keep Out". There shall also be "No Smoking" signs posted in prominent positions in the yard and loading areas, as well as other precautionary and safety signs, to assure that no ignition sources are present in these areas. The restriction of smoking to

McKesson Chemical Company

Security

(40 CFR Sec. 122.25(a)(4), 264.14)

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only designated areas is again a standard McKesson Chemical Company working rule.

No materials, empty pallets, or drums are permitted to be stacked against the fence in order to prevent easy access or concealment.

All critical locks are changed when a key holder leaves the Company, when a key is lost, or every two years, whichever occurs first.

All available lighting will be utilized to illuminate the buildings, fence, and yard. Electric timer switches are installed to control the lighting.

122.25(a) (5)(6)

McKesson Chemical Company

Inspection Schedules, Equipment Requirements, and Preventative Measures

(40 CFR Sec. 122.25(a)(5), 264.15, 264.174, 264.194,  
264.254, 264.255, 122.25(a)(6))

As a result of McKesson Chemical's being only a distributor of chemicals (no manufacturing, no processing), any branch will employ a limited variety of equipment in its daily business. Those few pieces, plus particularly all equipment and apparatus involved with safety, do receive regular well-defined inspections routinely, and all are subject to preventive maintenance. The net result is a constant evaluation of all relevant equipment and its operation for possible malfunctions, structural deterioration, operator errors, and unintentional misuses which could affect human health or the environment.

Table 1 shows the items which are routinely inspected and the types of problems which could present themselves or cause an item to be nonfunctional. The items have been selected as those being important to the facility maintaining a safe working environment for the employees, and to being valuable in preventing a threat to the public and/or ecological systems.

Included in Table 1 is a listing of the frequency with which the items are inspected. It should be noted that in addition to these inspections which are routinely done by the branch personnel, McKesson Chemical Company has other Company personnel not stationed at the facility, conduct a "Safety Audit" of the operation on a quarterly basis. This policy has been in place since 1978 and entails either the facility's District Manager or a member of the Regional Operations Department Staff's visiting the branch for what typically is a full day to inspect and evaluate the facility in approximately 180 areas pertaining to safety and operating procedures. Examples of areas checked are:

In addition to container inspections being logged, similar documentation is undertaken for Company quarterly safety inspections, sprinkler system inspections (weekly), fire extinguisher inspections (monthly) maintenance checklist (as designated by specific area), and governmental inspections (as performed).

This facility of McKesson Chemical Company does not utilize tanks of any sort for the management of waste materials. Thus, the regulations pertaining to inspections and the logging of such inspections on this type of equipment is not applicable.

This facility likewise does not utilize waste piles as a means of managing wastes, and the regulations pertaining to inspections and the logging of such inspections are not applicable.

If McKesson Chemical Company personnel, upon a routine inspection, find that a condition is present of a non-emergency nature which requires some type of maintenance in order to bring that particular article into compliance with standards, it shall be that employee's responsibility either to bring the subject concern into compliance, or to bring it to the facility management's attention to correct the deficiency. All remedial actions are undertaken at the earliest possible time in order to alleviate potential for further deterioration of equipment, or to eliminate an unsafe condition which could pose a threat to health or the environment.

If during an inspection a situation would be found which is of an emergency nature, or has the potential to be, the employee shall immediately initiate

McKesson Chemical Company  
Inspection Schedules, Equipment Requirements  
& Preventative Measures  
Page 2

- |  |   |
|--|---|
| 1. Office area   | 8. Warehouse & dock                         |
| 2. Drivers' records  | 9. Yard area                                |
| 3. Fire protection   | 10. Transportation                          |
| 4. Maintenance   | 11. Physical layout & equipment             |
| 5. Compliance with OSHA,<br>DOT, all applicable<br>rules and regulations | 12. General recordkeeping and<br>control    |
| 6. Security  | 13. Compatibilities of stored<br>materials. |

Inspections of the hazardous waste container storage area will be conducted as outlined in Table 1. Results and documentation of any remedial actions which might be required will be recorded on an inspection log sheet similar to the one found following this narrative and entitled "Inspection Log Form". Information to be included on the log sheet shall include the item inspected, date and time of inspection, name of inspector, remedial action (if necessary), and supervisor's signature. McKesson Chemical Company has also developed the form entitled "In House Container Inspection Checklist", which is included immediately following the Inspection Log Form. Included on this form is a listing of areas which should be reviewed pertaining specifically to the area of container management. The inspector is required to check the status of each item and make a decision as to acceptable or unacceptable. On the lower portion of the form, are action codes for remedial activities which might be necessary to implement if conditions are found which might necessitate some action. Upon discovery, the appropriate personnel shall ensure that the proper actions to remedy an unsafe situation are undertaken. Any remedial actions shall be noted and kept on file with appropriate reports made, if necessary.

remedial action, and notify the appropriate emergency coordinator who shall carry out his/her actions as outlined in the Contingency Plan. As outlined within the Contingency Plan, in the event of a release of materials, it shall be the objective to contain, isolate, clean-up, and decontaminate the affected area with the utmost concern for minimizing risk to Company workers, the public, and the environment. The clean-up material must then be properly disposed of, and necessary documentation and reporting undertaken.

Inspection logs are maintained and kept at the facility by the Operations Manager. The format of the inspection log is included at the end of this narrative and is to be maintained at the facility for a minimum of 3 years from the date of inspections. Any extraordinary occurrences such as a waste release or fire requires a written report which shall be kept on file at the facility, as well as being forwarded to the appropriate agencies and Company personnel as outlined in the "Contingency Plan" section.

McKesson Chemical Company does not request a waiver of the preparedness and prevention requirements under 40 CFR 264 Subpart C. Requirements of this section of the regulations are to be complied with.

Specific discussion pertaining to internal and external communications capabilities, the internal alarm system, emergency equipment present on-site, fire control equipment present on-site and training in its use, is discussed either in this section accompanying "Contingency Plan".

The telephone system at this facility provides the main internal as well as external means of communication. A designated alarm system is utilized by

branch personnel to act as an alert system for emergency situations with instruction and drills conducted on a routine basis.

Emergency equipment maintained at this facility is listed in the Contingency Plan.

Adequate water is provided at this facility by means of fire hydrants as shown on the facility site plan. The building itself is protected by a sprinkler system with an automatic alarm system hookup, although no waste materials are stored within the building.

Table 1

McKesson Chemical CompanyInspection Schedule  
(To be kept at Facility)

<u>Area/Equipment</u>	<u>Specific Items</u>	<u>Types of Problems</u>	<u>Frequency of Inspection</u>
<u>Container Storage Area</u> (Secondary Containment)	General Area	Leaks, spills	Daily
	Container placement and stacking	Aisle space	Weekly
	Sealing of containers	Open bungs, lids	Weekly
	Labelling of containers	Improper identification Date missing illegibility	Weekly
	Base	Cracks, erosion	Daily
	Berm	Cracks, deterioration	Daily
	Warning signs	Damaged	Weekly
	Debris & refuse	Aesthetics	Weekly
	Accumulated liquid	Contamination	Daily, and confirm after precipitation
<u>Security Devices</u>	Facility fence	Corrosion, damage	Weekly
	Main Gate	Corrosion, damage, non-functioning	Weekly
<u>Loading, Unloading Areas</u>	Surface areas	Deterioration spills	Daily
	Dock bumpers	Damage	Daily

Inspection Schedule  
McKesson Chemical Company  
Page 2.

<u>Area/Equipment</u>	<u>Specific Items</u>	<u>Types of Problems</u>	<u>Frequency of Inspection</u>
<u>Safety &amp; Emergency Equipment</u>	Emergency shower & eye wash	Water pressure, leaks drainage	Weekly
	Industrial absorbent	Out of stock	Monthly/ as needed
	Overpack drums	Out of stock	Weekly
	Face shields	Broken or dirty	Monthly/ as needed
	Chemical cartridge respirators with cartridges for organic solvents	Spent solvent, seals	Monthly/ after each use
	Portable pump	Power, clogging	Monthly
	Fire extinguishers	Recharging	After each use
	Fire alarm systems	Power failure	Per NFPA
	Telephone system	Power failure	Per NFPA
	Emergency lighting system	Battery failure	Per NFPA
	First aid equipment and supplies	Items out of stock or inoperative	As used
	Protective clothing	Holes, wear & tear	As used
	Decontamination wash room	Water pressure, leaking drainage	As used
	Forklifts	Brakes (includes parking), tires (pressure), horn, lights, hoist, tilt, forks, steering, water level rad/batt., engine oil level, hydraulic oil leak	Daily

McKesson Chemical Company

In House Container Inspection Checklist

A. <u>Location</u>	<u>YES</u>	<u>NO</u>	<u>Recommended Action</u>
1. Waste materials properly segregated according to McKesson compatibility storage program.	_____	_____	_____
2. Ignitables (flammables, combustibles) located 50 feet from property lines.	_____	_____	_____
3. Aisles provided for emergency access.	_____	_____	_____
B. <u>Container Condition</u>			
1. All containers sealed.	_____	_____	_____
2. Any leaking containers.	_____	_____	_____
3. Any containers swollen or bulged.	_____	_____	_____
4. Any containers concaved due to vacuum building up.	_____	_____	_____
5. Any containers with extreme corrosion	_____	_____	_____
6. All containers properly labelled and identified.	_____	_____	_____
8. All containers have lot number	_____	_____	_____
9. All containers compatible with products stored in them.	_____	_____	_____

Inspector: \_\_\_\_\_ Date: \_\_\_\_\_

I have reviewed this report and certify all storage is in satisfactory condition.

Supervisor: \_\_\_\_\_ Date: \_\_\_\_\_

Recommended Action Codes

- A - Effect McKesson compatibility program
- B - Effect container receiving maintenance procedure
- C - Effect container transfer procedure
- D - Effect spill control procedure

I certify that the above recommended action has been taken on:

Date: \_\_\_\_\_ Storage is now satisfactory.

Supervisor: \_\_\_\_\_ Date: \_\_\_\_\_

## INSPECTION

## RESULTS

[illegible]

122.25(a) (7)

McKesson Chemical Company

Contingency Plan

(40 CFR Sec. 122.25(a)(7), 264.37,

264.51 - 264.56, 264.171, 264.194(c), 264.255)

The following Contingency Plan and Emergency Procedures have been developed for the McKesson Chemical Company facility located at 26601 Richmond Road, Bedford Heights, Ohio. The intent of these plans is to provide information and assign responsibilities so that in the event that an emergency situation should arise, all necessary actions will be undertaken to minimize the threat to the facility employees, neighboring members of the public, Company property, adjoining property, human health, and the environment. These plans are designed to be a total facility response program with the assumption that the aspect of potential emergency situations pertaining specifically to hazardous waste management are incorporated into the overall plan.

McKesson Chemical Company branch in Bedford Heights is a distributor of various industrial chemicals. No manufacturing or processing activities are carried out at this facility. The Company purchases chemical commodities from various manufacturers, and distributes them to customers which utilize these products in their manufacturing processes.

The owner of this facility is Foremost-McKesson, Incorporated, the parent corporation of McKesson Chemical Company, located in San Francisco, California, Telephone (415) 983-8300. Mr. Clifford Moll is the branch manager of the facility, and is also the primary emergency response coordinator. Mr. Moll or the alternate emergency coordinator may be reached at (216) 292-7500 at the facility during normal working hours of 8 a.m. to 4:30 p.m. on weekdays. Home phone numbers are listed in the included Emergency Phone Number Listing for the coordinator and alternate.

McKesson Chemical Company's fundamental involvement as it relates to hazardous waste management, is that of receiving back from off-site generators spent solvents, temporarily storing them in order to accumulate economic truckloads, and then reshipping these materials to a Company-owned recycling center at another location. Materials which may be deemed as hazardous wastes are stored in one location on the property. All materials are handled in drums of 55 gallon capacity or less as described in the section listed as "Containers Utilized Holding Free Liquids". The maximum storage of drums shall be about 100, and the designated storage area is shown on the site plan. A description of this area may be found in the section entitled "Secondary Containment System Design and Operation". The section entitled "Closure and Post-Closure Plans" outlines the types of materials which are typically stored at this facility. A copy of the Contingency Plan including a site plan locating various emergency facilities, has been distributed to local emergency authorities; receipts are appended.

In the event of an emergency situation, the individual making discovery of the occurrence is to immediately notify the emergency coordinator or his alternate; if neither is available, the next alternate listed on the Emergency Phone Number listing. The Emergency Coordinator, as do his alternates, have the authority to commit Company resources and initiate requests for assistance to any emergency agency.

The phone number listing and emergency procedures outlined in the Plan are posted within the facility and are kept readily available by the listed coordinator and his alternates.

The decision must be made by the coordinator or his alternate, whether a situation poses imminent threat to human life, health, or the environment to such an extent

as to require implementation of the contingency plan.

In any emergency situation, it is important that the outline of actions and procedures to be followed be as concise as possible to allow the response to be as prompt as possible to minimize risk. For this reason, the Plan includes the Emergency Phone Number Listing and Emergency Procedures to be followed by this facility which are posted and held by the coordinator and his alternate. For purposes of this application, an elaboration of specific areas will be discussed for various considerations pertaining to the Contingency Plan. This will also be used by facility management for reference.

The Contingency Plan will be implemented for any of the following situations:

1. Fire and/or Explosion - the coordinator or his alternate must make an assessment as to the number of different potential problems or situations which might present themselves in an emergency, and how to deal with them. Consideration must be given to items such as:
  - Release of fumes and possible necessity for neighbor evacuation.
  - Potential materials which when exposed to fire could explode and result in flying debris which could spread fire to off-site areas or previously unaffected areas at the facility.
  - Explosions which could result in the release of materials from containers.
  - Residues from fire fighting activities which may require to be contained and dealt with in an appropriate manner if deemed hazardous.
2. Spills of Material Release - the coordinator or his alternate must make an assessment and take necessary actions to alleviate risk in

such a situation. Consideration must be given to the following potential threats:

- The potential for the released material being a flammable liquid which would pose a fire hazard.
  - The possibility of ground contamination which would require removal and proper disposal of soil showing such contamination.
  - Dealing with surface water which may become mixed with the released material.
  - Awareness and guarding for potential ignition sources and determining whether the release of fumes could pose a fire and/or explosion hazard which might necessitate neighbor evacuation.
3. Floods - although this facility is not located in a floodplain, the emergency coordinator must remain cognizant of weather conditions and implement removal of materials to a higher ground if a situation presented itself which necessitated this activity. Contact with the National Weather Service would be initiated in the event that conditions are present which could bring about possible flooding.

It is a McKesson Chemical Company policy that emergency plans and procedures be kept available at the facility and that emergency drills be conducted at 6 month intervals to include all facility personnel.

As mentioned earlier, in the event of an emergency situation, the emergency coordinator must be notified, and in his absence, an alternate in descending order as listed on the Emergency Coordinator listing. The coordinator at that point shall make a determination as to the appropriate measures to be implemented (i.e., alarms, evacuation, etc.) and what Federal, State, or local agencies as well as fire and

police departments, must be advised to render assistance.

In the event of a release of fire, the coordinator must try to determine by observation, facility records, or analysis (if time permits), what is the identity of the material involved, exact source, amount, and extent of impact the released material will have from a human and environmental aspect.

An assessment of the situation must be made to determine possible hazards to human health and/or the environment due to the emergency situation. The coordinator must look at all possible direct and indirect effects which might result from the emergency. The coordinator must further determine whether the facility personnel are adequately equipped to deal with the situation, or whether it is necessary to contact outside emergency agencies to render assistance.

The potential incidents which are of highest priority for emergency planning at this facility are (1) fire and/or explosion, (2) spills or material releases. Other natural disasters such as tornadoes, earthquakes, floods, etc., would be handled in similar response manners as outlined in the Contingency Plans as deemed appropriate by the emergency coordinator.

The outside storage yard which includes the designated waste storage area, is accessible by means of entry through the loading area and around the southwest corner of the building. This area is surfaced with concrete and remains unobstructed at all times.

#### Fire

Personnel at the facility have been provided instruction by the local fire department on use and application of various on-site fire extinguishers for fire fighting efforts until appropriate outside emergency teams arrive. The efforts

of facility personnel shall center on extinguishing the fire or preventing its spread, based upon circumstances.

The coordinator shall assure that if appropriate, the evacuation signal is given, at which time all personnel who are not directly involved in the incident control efforts, are to proceed to the designated congregation point which is indicated on the site diagram included in the Contingency Plan. All activities shall be ceased within the facility and equipment removed from the building proximity as time allows. Power sources must be shut down. Traffic flow and outside observers must be controlled and the area isolated to alleviate potential additional ignition sources. Should the materials which may be affected by the emergency be of such a nature as to pose a threat of violent conflagration, explosion, or fume release, the coordinator shall advise emergency personnel, and render any assistance deemed necessary to implement evacuation of the surrounding area within 1/4 mile. All employees trained and partake in drills on evacuation procedures and are instructed not to leave the designated congregation point unless so directed by the party responsible for accounting for all employees.

The emergency coordinator shall make the judgment as to allow return to the building, or to release personnel to leave the site once the emergency situation has been brought under control.

### Spills

Spills or material releases upon discovery must be reported to the emergency coordinator or an alternate. Immediate response is required to minimize the impact of the release. The coordinator must assess the proper actions and precautions to be taken to protect human health and the environment. He must

also initiate appropriate activity to identify, contain, collect, and properly dispose of the material.

Because this facility deals with only containerized materials in waste form, the amount of material which has potential for release from one container is relatively small. However, prompt and safe procedures must be followed by deal with such a situation in an appropriate manner.

The coordinator or an alternate must make continual assessments as to the potential impacts of the release pertaining to fire hazards, fume escapes which may necessitate evacuation of the facility and/or neighbors, initiating clean-up (and assuring of the proper utilization of safety equipment to undertake this activity), determination of necessity for calling in of outside emergency agency assistance, and initiating the required reporting and documentation of incidents (i.e., materials designated by RQ quantities as listed under Superfund, Solid Waste Disposal Act, Clean Air Act, Clean Water Act, or TSCA; or which could be classified as a hazardous waste under RCRA).

The secondary containment area will catch materials released from drums during storage, and upon discovery during routine inspections, the coordinator is to be notified and initiate appropriate clean-up measures. Liquid material will be removed by means of a portable pump, and placed into an appropriate specification drum for the material. Should soil contamination be evident, a layer of soil shall be removed to an adequate depth to assure that all contamination is removed. The contaminated soil shall be placed into open-top drums and sealed for disposition. All accumulated liquids and collected clean-up materials shall be labelled and marked as appropriate for the material. Samples of resulting materials released shall be taken if for some reason there should be any

question as to composition or hazard due to multiple container releases, water extinguishing material dilution, etc.

In the event that soil would need to be removed from the berm areas to remove contaminants, the containment area shall be regarded to the original dimensions and capacity as originally designed. Appropriate safety equipment usage shall be enforced during all of these procedures. Proper documentation of the incident in the facility records shall be initiated, and reporting of the incident to federal, state, local, and Company personnel shall be undertaken as appropriate. In the event that the Contingency Plan must be implemented and the incident is reportable as defined by 40 CFR 264.56(J), a written report shall be filed with appropriate federal, state, and local authorities.

In addition to any reports required by government agencies, McKesson Chemical Company requires incidents to be reported within 48 hours to the Regional Operations Department located in Montvale, New Jersey ((201) 573-9480).

Collected materials from a release situation shall be typically disposed of through McKesson EnviroSystems. In the event that they were unable to deal with the materials based on permits and/or technology, an outside disposal firm would be contracted with to make disposition of the material. In any event, the coordinator shall be responsible to assure that the party making disposition of the material is properly permitted and has the resources to deal with the residuals in a proper fashion.

If for some reason released material were to escape the secondary containment area, the coordinator shall initiate response to personnel to contain the materials by means of an inert material such as sandbags, Hazorb absorbent,

or standard industrial absorbents (Zorb-All, etc.). The same procedures, efforts, clean-up, safety considerations, assessments, and documentation/reporting requirements shall be followed as was outlined in the event of an occurrence within the secondary containment area.

All receipts of waste materials shall be ceased during a clean-up activity until the task is completed and activities are able to be returned to normal.

All equipment used in clean-up which may have become contaminated during activities shall be decontaminated using materials as appropriate to cause removal of the contaminant. The resulting material from this decontamination process shall be placed within the residual clean-up containers for disposal, unless it is deemed incompatible with materials already contained in such vessel.

During any emergency situation, the emergency coordinator must take all reasonable measures necessary to ensure that fires, explosions, and releases, do not occur, recur, or spread to other unaffected areas of the facility. These measures must include, where applicable, stopping processes and operations, collecting and containing released waste, and removing and/or isolating containers.

Immediately after an emergency, the coordinator or an alternate must provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility. Assurances must be made that all of these endeavors are undertaken in the appropriate manner as governed by federal, state, and local laws. Residual material from clean-up operations shall be properly stored, marked, labelled, and handled as to prevent any further incident.

The emergency coordinator or an alternate must ensure in an emergency situation that in the affected area of the facility, no waste which might be of an incompatible nature with the released material is stored until clean-up procedures are completed.

All emergency equipment listed in the Contingency Plan which is present at the facility and may have been utilized during the emergency situation must be cleaned, recharged, inspected, replaced, and fit for use before resuming normal operations.

This McKesson Chemical Company facility has an assortment of emergency equipment present for use in different emergency situations. On-site emergency equipment is kept in various designated locations within the warehouse, as well as driver kits on each truck which contain specific items which may be utilized in potential emergency situations while on the road. A listing of equipment available at the facility is included in the Plan.

Fire extinguishers of a dry chemical variety meeting Type ABC fire fighting capabilities are located throughout the warehouse facility in such a manner that no point within the building proper is further than 50 feet from an extinguisher. All extinguishers comply with National Fire Code standards for portable fire extinguishers, and they are inspected after each use and on a routine monthly basis. Records of inspections are kept in the operating log. The entire building is also protected by an automatic sprinkler system which is also inspected and logged on a routine basis.

Emergency and safety equipment which is available for incident use is kept in the warehouse in designated areas and includes the following:

Butyl Rubber Acid Suits	Fire Extinguishers
Rubber Boots	Reflective Triangles
Rubber Gloves	First Aid Kits
Chemical Goggles	Neutralizer Solutions
Face Shields	Flashlights
Hard Hats	Absorbent of Different Varieties
Portable Transfer Pump	(e.g., sand, Zorb-All, Hazorb)
Extension Cords	Banding Tools
Recovery Drums	Safety Shower
	Assorted Hand Tools

All pieces of equipment are routinely inspected to assure their readiness for use in an emergency situation. Review of the use of articles of safety equipment is undertaken periodically during the monthly safety meetings conducted at the facility with appropriate personnel. These meetings are documented.

McKesson Chemical Company has provided copies of the Contingency Plan and site plan layout diagram to the Bedford Heights Fire Department, the Bedford Heights Police Department and the Suburban Community Hospital. Copies of receipts for their copies are included in the appended copy of the Plan.

The emergency coordinator or an alternate shall make the determination to evacuate the facility in an emergency situation. The fact that this facility employs only 25 people simplifies the nature and relative complexity of accounting for individuals. The building size is approximately 20,500 square feet, with two main exits to gain egress.

The facility has an alarm system to alert all employees as to an evacuation condition. The phone system is also equipped with an intercom which allows

conversation between different areas of the building. The coordinator shall initiate all evacuations. A fire alarm system is also present in the facility to alert all facility personnel and summon the fire department.

In the event a determination is made that a situation is present which warrants facility evacuation, the coordinator must assure that the following actions are carried out:

- Signal for plant evacuation.
- All individuals shall vacate the facility in an orderly manner to the congregation point designated on the site diagram included in the Contingency Plan.
- All persons which have not been designated to render assistance in the control of the emergency situation by the coordinator, shall remain at the congregation point so as to be accounted for by the designated person(s). Reentry into the building or permission to leave the property may only be granted by the coordinator so as to assure all persons are accounted for.
- In the event that an individual is found to be missing at the congregation point, the assigned individual whose responsibility it is to take a head count, shall notify the coordinator of the missing party. The coordinator shall assess the conditions present and take appropriate actions to form a search effort.
- Drills shall be conducted at 6 month intervals in order to reinforce evacuation procedures.

As required under the regulations, a written report of emergency events shall be made within 15 days to the EPA Regional Administrator and to the corresponding

state authority. The following information shall be contained in such report:

1. Name, address, and phone number of the owner or operator.
2. Name, address, and phone number of the facility.
3. Date, time, and type of incident.
4. Name and quantity of material(s) involved.
5. Extent of injuries (if any).
6. An assessment of actual or potential hazards to human health or the environment, where applicable.
7. Estimated quantity and disposition of recovered material that resulted from the incident.

These reporting requirements are above and beyond all McKesson Chemical Company reporting requirements which shall be adhered to and forwarded in 48 hours or less to the Regional Office of McKesson Chemical Company.

The Contingency Plan will be reviewed and immediately amended whenever:

1. The facility permit is revised.
2. The plan fails in an emergency.
3. The facility changes in its design, construction, operation, maintenance, or other circumstances in a way that materially increase the potential for fires, explosions, or releases, or changes in the response necessary in any emergency.
4. The list of emergency coordinators change.
5. The list of emergency equipment changes.

Because this facility has no tanks present containing waste materials, the Contingency Plan does not address spills or leaks from such vessels.

This facility likewise does not have waste piles present and thus, it is not necessary to address this aspect of emergency situations in the Contingency Plan.



McKesson Chemical Company

Procedures, Structures, Equipment

(40 CFR Sec. 122.25(a)(8))

The hazardous waste management activities undertaken at this facility of McKesson Chemical Company is that only of temporary storage of drummed solvents which are defined as hazardous wastes. There is but one location at the facility which is utilized for loading and unloading of materials received from off-site generators. The loading/unloading area is designated on the facility diagram.

This facility receives less than truckload quantities of waste materials from off-site generators and temporarily stores them in order to accumulate economical truckloads of these materials to warrant the distances involved in reaching the recycling centers to which these waste materials are ultimately destined.

The amount of handling of the drummed materials while at the facility is kept to an absolute minimum to minimize the likelihood of damage and possible release. Once trucks carrying waste materials are at the dock area and secured by means of wheel chocks, forklifts are utilized to transfer the drums from the truck onto wooden pallets in the staging area at the loading and unloading area. Drums are placed four to a pallet, and once the necessary administrative procedures and verification counts have been made as outlined under "Containment Management Practices", full pallets are carried by forklift to the designated storage area where they remain on the pallet. While in storage, the drums are inspected in accordance with the inspection schedule listed in Table 1. Sufficient spacing around each pallet of drums is maintained to ensure the avoidance of damaging drums while placing pallets adjacent to another.

Once an economic truckload quantity of material is accumulated, the full pallets of drums are brought to the staging area at the dock, prepared for shipment, and placed onto the vehicle transporting them to the recycling center. Because of the minimal handling during the materials presence at the facility site, the likelihood of spills is minimal, but should an incident occur, spilled material would be contained and picked up by use of Hazorb or other industrial absorbents which are readily available at the site. Any contaminated material shall be picked up and placed in an open-head drum compatible with the material, and sent to a properly permitted disposal facility.

As previously outlined in the section "Secondary Containment System Design and Operation", any water runoff from the designated waste storage area will be caught in the containment area by the berm. Upon examination of the collected water, with no evidence of contaminants, the water can be released and ultimately feeds into the municipal storm sewer system. Should evidence of a spill be present in the berm area, an analysis of the effluent will be conducted if it is not evident as to the source and nature of the contaminant. Once the contaminant is identified, all effluent in the berm area shall be drummed by means of a portable pump, and held until arrangements can be made for its proper disposition to an appropriately registered and equipped disposal site. All other run-off from the property flows to the municipal storm sewer system.

Ground water contamination is prevented at this facility by assuring that all containers of waste materials are stored in a closed, good quality drum, and remain at all times in the designated hazardous waste storage area which

has the secondary containment system protection described in detail in the section entitled "Secondary Containment System Design and Operation". The design, operation, inspection, and construction of this area is such, as to minimize the threat of possible ground water contamination.

Because of the absence of process operations at this facility in which an equipment or power failure could cause a threat to human health or the environment, the impact of such an occurrence would be negligible. However, in the event that loading or unloading activities might be under way during a power failure, and the available light were of an insufficient nature to safely complete the task, operations shall be ceased until the power company is notified and the cause of the failure discovered and repaired. Any problems which might be isolated to a specific area of the facility or a particular machine shall be brought to the manager's attention for corrective actions with support from Regional Operations if required.

McKesson Chemical Company facilities maintain on-site Material Safety Data Sheets for the products which they distribute. Copies of the appropriate Material Safety Data Sheets for specific chemical materials handled in waste form follows the "Contingency Plan" section. These data sheets are kept on file and are updated routinely so that facility personnel have accurate information available regarding toxicity, fire and explosion hazards, protective equipment recommendations, and first aid. Available protective and emergency equipment which is kept at the facility is presented in the section entitled "Contingency Plan". Use of personal protective equipment is strictly enforced and is covered in the employees initial training, as well as being reinforced on a routine basis in monthly safety meetings which

are conducted by the facility management.

McKesson Chemical Company

Prevention of Reaction of Ignitable, Reactive, or Incompatible Wastes  
(40 CFR Sec. 122.25(a)(9), 122.25(b)(1)(iii), 122.25(b)(2)(vi), 122.25  
(b)(4)(ii)(D)(1), 264.17, 264.176, 264.177, 264.198, 264.199, 264.256,  
264.257, 261.21, 261.23)

A McKesson Chemical Company storage facility handles materials in waste form from off-site generators who wish to employ the Company's recycling capabilities. This site functions as a temporary storage and transfer point for accumulating economic truckloads to make it economically feasible to reship these materials the distance involved in getting to the recycling centers.

Some of the materials handled in waste form at this facility are expected to fall into the category of an ignitable. This facility will not handle any materials which would be classified as a reactive waste and for which special precautions would be required. All waste materials are stored in the designated waste storage area indicated on the facility diagram.

All containers (drums) utilized for shipments of waste materials are of proper specifications as outlined in the section entitled "Containers Utilized Holding Free Liquids", to contain, store, and transport the materials handled. All containers of waste material are tightly closed while in storage. The waste storage area is isolated from vehicle traffic pattern, and the activities conducted in the yard area are limited. It is McKesson Chemical Company's policy that no smoking is allowed in any areas of the facility other than office and breakroom areas. "No Smoking" and "Danger-Unauthorized Personnel Keep Out" signs are prominently posted. Personnel are instructed and familiar with the required precautions which must be exercised when working around ignitable materials such as the use of spark proof tools, elimination of possible ignition sources, etc.

In the event that a leaking container is discovered and requires transfer while in storage at this site, only clean, new or reconditioned containers of the proper specification for the material will be utilized.

Containers of ignitable wastes while present at this facility are handled with the respect they deserve in order to minimize the possibility for fire or explosion. All containers must be kept tightly sealed and be in good condition (including proper labelling and marking) prior to our drivers' accepting them at the generator's facility. Drums are placed on wooden pallets and remain on these pallets while in storage to reduce handling. Pallets of waste materials while in storage in the designated hazardous waste storage area are typically stacked two, but in no case more than three high. Space is maintained around stacks of pallets to facilitate inspection of the drums. Stacks will be maintained in a neat manner with no overhang or leaning. Only good quality wooden pallets shall be used. The designated hazardous waste storage area is more than 50 feet from the facility property lines as required.

Containers of waste materials destined for recycling which are received at this facility are already sealed by the generator and shall remain sealed unless a leaking container were discovered, in which case it is transferred to a different container - a clean drum meeting the proper specification for the material involved. Customers (generators) who employ our services are encouraged to use the same container for the waste material which originally held the virgin product, unless another commodity which is not compatible with that container has been introduced into the waste stream. This minimizes the likelihood of container incompatibility with the material, as well as the solvents'

(residue vs. waste) possibly being incompatible and causing a reaction or the loss of the reclaim value of the material. Materials typically handled by this facility for recycling are compatible with each other in that when combined they do not cause a reaction. Attention is given to having customers avoid these practices because of the potential problems which could result, and the rendering of the materials as of no value because of the inability to recycle the material.

This facility does not utilize tanks for the management of waste materials of any kind so the regulations pertaining to the management of ignitable, reactive, or incompatible wastes in such vessels is not applicable.

This facility does not utilize waste piles for the management of waste materials of any kind so the regulations pertaining to the management of ignitable, reactive, or incompatible wastes by this means is not applicable.



McKesson Chemical Company

Traffic Patterns

(40 CFR Sec. 122.25(a)(10))

The McKesson Chemical Company branch in Bedford Heights has the following trucking fleet:

- Four - 3-axle tandem tractors
- One - 2-axle tandem tractor
- Two - 32 foot van trailers
- Five - 40 foot van trailers
- One - Straight truck

These units are registered with the Public Utilities Commission of Ohio and are permitted to transport hazardous waste. The maximum gross vehicle weight of the largest tractor/trailer combination at this facility is 73,000 pounds (loaded).

All roads travelled are of either bituminous or concrete construction with load-bearing capacity to withstand even the largest vehicle assigned to this facility. All traffic areas within the facility's boundaries are concrete.

Once a truck has entered the facility and backed into the loading dock, the branch personnel will utilize our LPG fueled forklift with a 4,000 pound capacity to remove drums of spent solvent from the van trailer; if they do not arrive on pallets, they will be palletized immediately - four drums to a pallet.

There will be no discernable increase in traffic to or from the branch because of the branch's hazardous waste handling, since essentially all pickups of spent solvents will be made by trucks already on the customer's premises by virtue of a delivery.

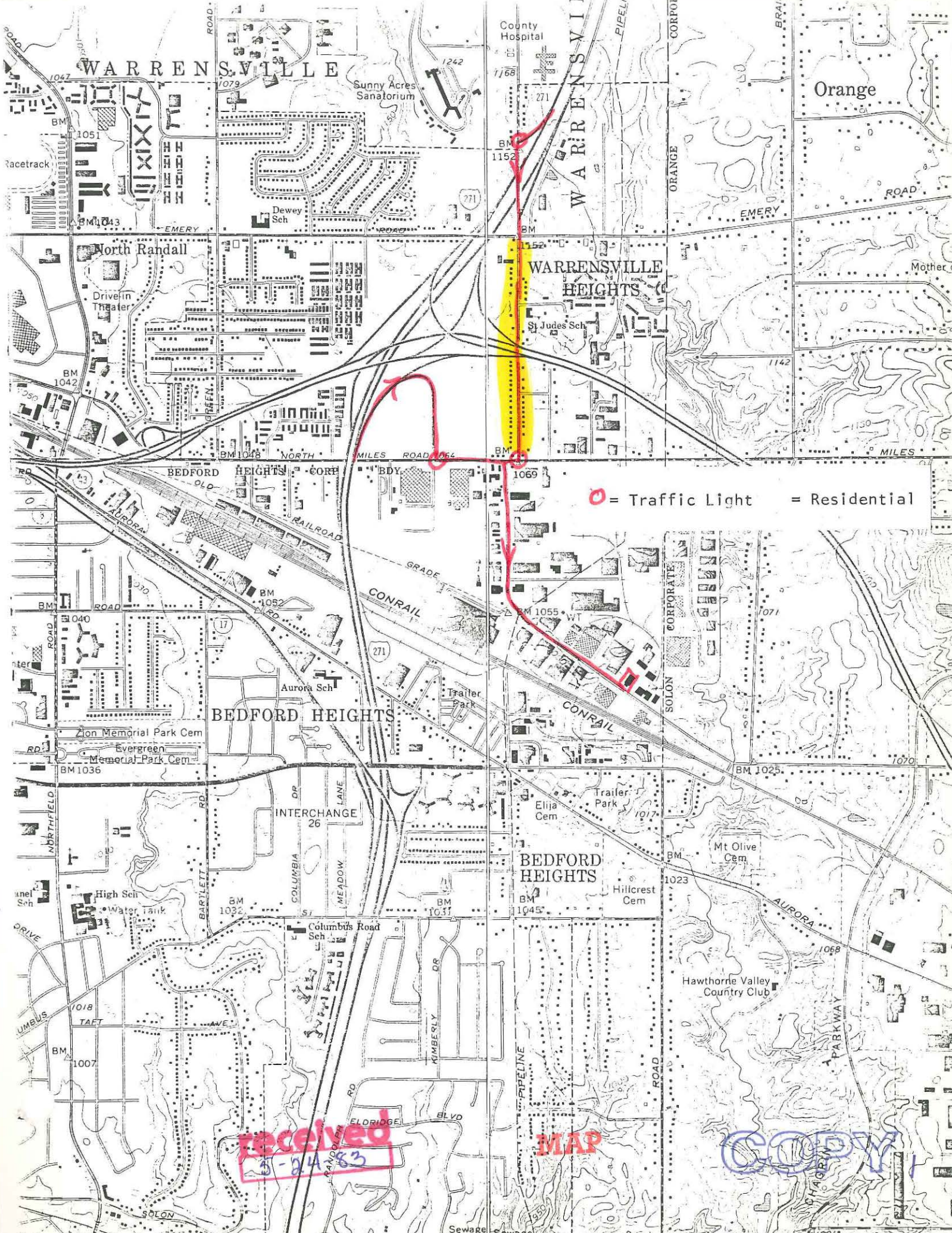
The Interstate Highway nearest the McKesson facility is I-271. McKesson trucks returning Northbound turn off at Miles Road and head East on Miles for about a quarter of a mile to the intersection with Richmond Road. The branch is located about 3/4 mile South on Richmond. This route is essentially all industrial.

Southbound truck traffic turns off Interstate I-28; at Richmond Emery Road, and then follows Richmond directly to the branch. Some of this route is residential, and is highlighted in yellow on the following map.

These routes and the traffic control devices encountered are delineated in the following map.

It should be kept in mind that pickups and deliveries of spent solvents will be relatively infrequent, that often the 55-gallon drums will constitute only part of the load, and that the hazardous waste solvents involved were all transported along these routes and in this equipment in the first place.

The concrete area within the yard is 8 inches thick with 6 inch by 6 inch mesh of No. 6 reinforcing rod. The specified load-bearing capacity is 3,000 lbs/sq. in.



Orange

County Hospital

Sunny Acres Sanatorium

Dewey Sch

WARRENSVILLE HEIGHTS

St. Jude's Sch

North Randall

Drive-in Theater

BEDFORD HEIGHTS

MILES ROAD 1064

○ = Traffic Light      = Residential

BEDFORD HEIGHTS

Aurora Sch

CONRAIL

BEDFORD HEIGHTS

Eliza Cem

Trailer Park

Hillcrest Cem

Mt Olive Cem

Hawthorne Valley Country Club

received  
3-24-83

MAP

COPY

McKesson Chemical Company

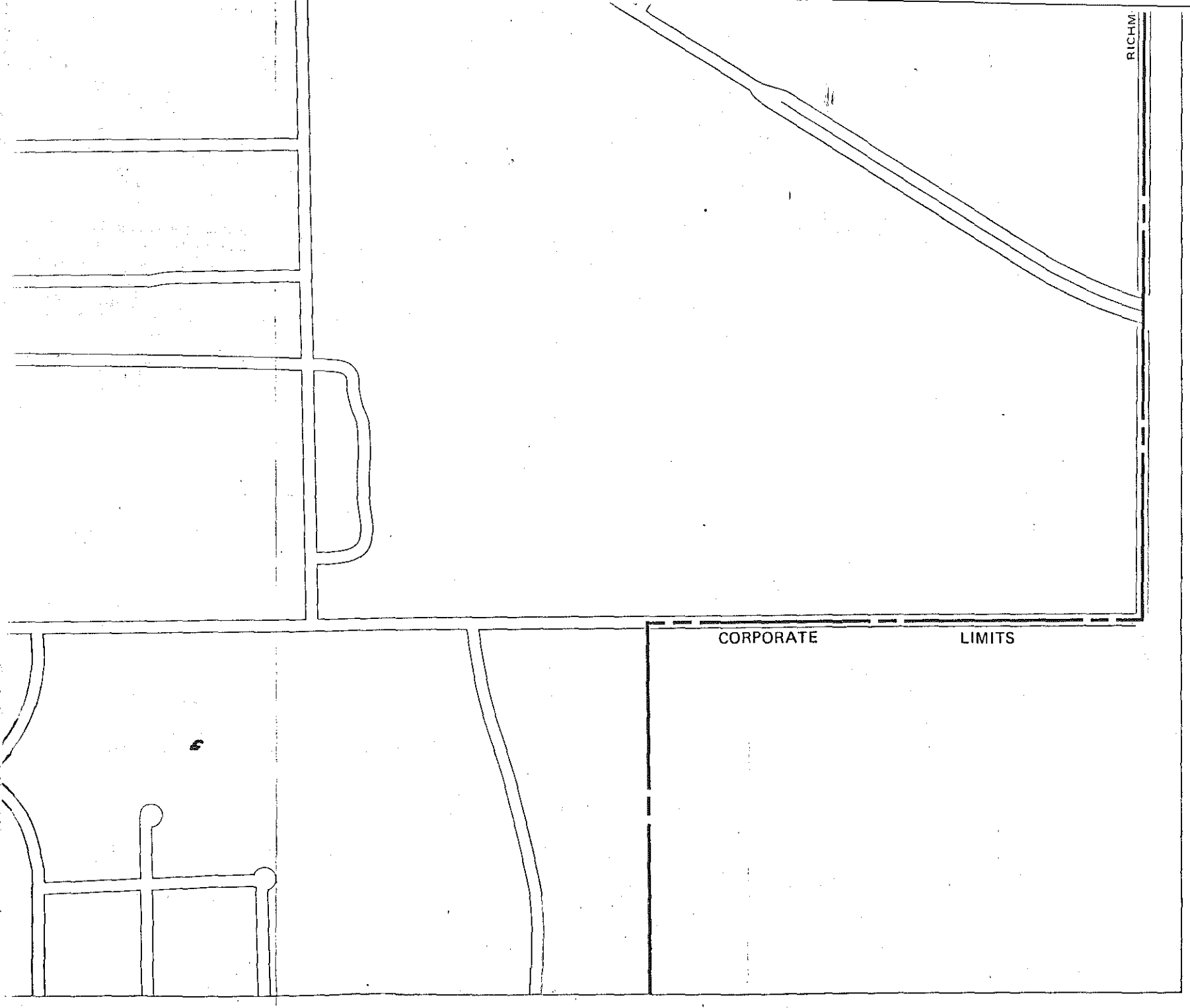
Facility Location Information

(40 CFR Sec. 122.25(a)(ii,v); Part 264 Appendix VI)

Floodplain - The floodplain map for this area, supplied by the United States Department of Housing and Urban Development, Federal Insurance Administration, indicates this location not to be affected; the appropriate section of the relevant map follows.

Seismic Considerations - Potential seismic activity is not a factor at this location.

Wind Rose - A statistical analysis of wind direction at Cleveland (Percent Frequency by Direction) was furnished by the Ohio EPA. A copy follows.



RICHM

CORPORATE LIMITS

NATIONAL FLOOD INSURANCE PROGRAM

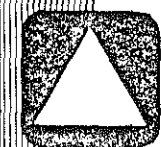
**FIRM**  
FLOOD INSURANCE RATE MAP

CITY OF  
**BEDFORD  
HEIGHTS,**  
**OHIO**  
CUYAHOGA COUNTY

PANEL 1 OF 2

COMMUNITY-PANEL NUMBER  
390096 0001 B

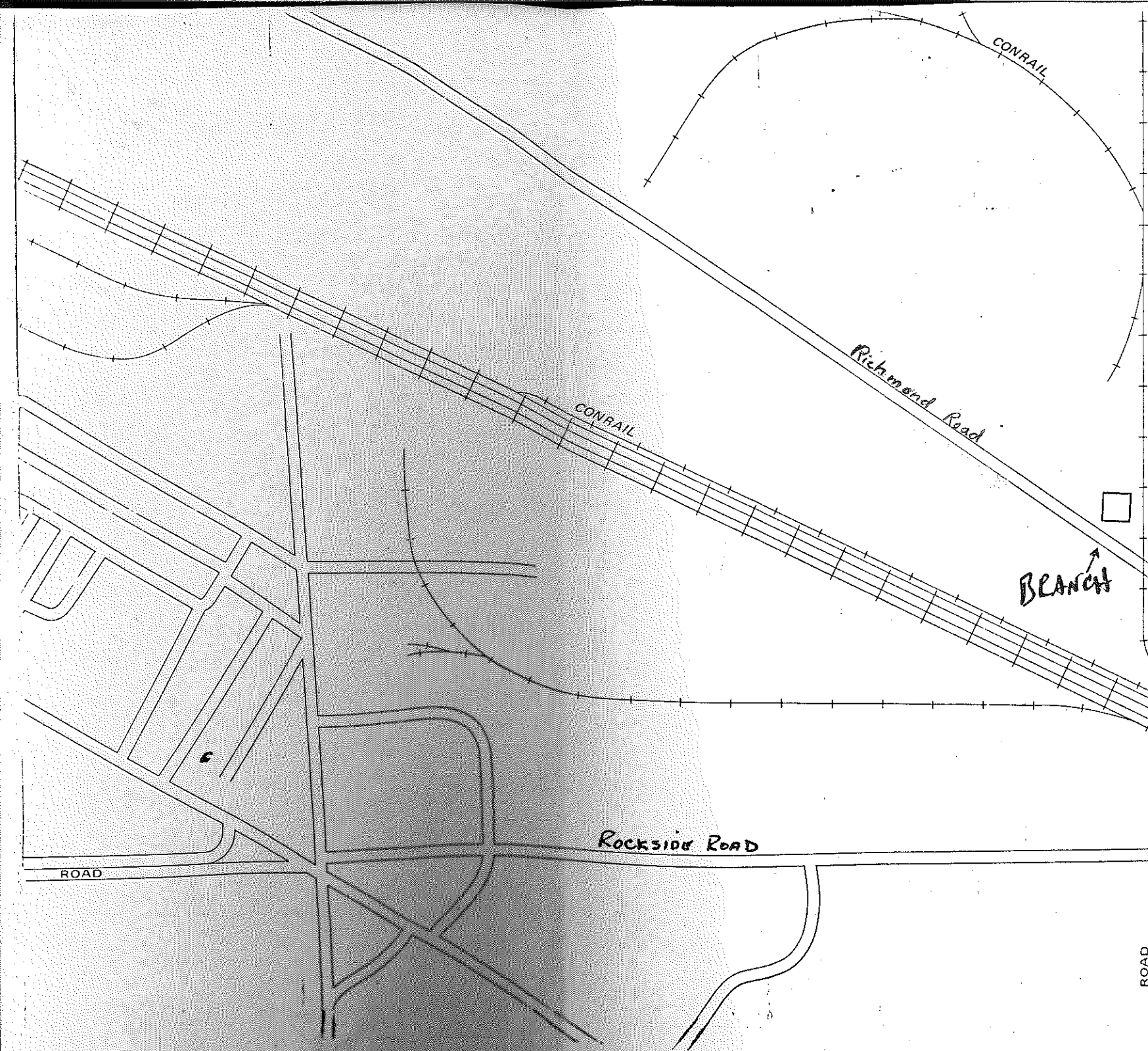
EFFECTIVE DATE:  
SEPTEMBER 17, 1980



federal emergency management agency  
federal insurance administration

RECEIVED  
1-5-83

COPY, MAP



show all areas subject to flooding in the community  
all planimetric features outside special flood hazard areas.  
For adjoining map panels, see separately printed Index To Map  
Panels.

INITIAL IDENTIFICATION:  
MARCH 22, 1974

FLOOD HAZARD BOUNDARY MAP REVISIONS:  
APRIL 30, 1976

FLOOD INSURANCE RATE MAP EFFECTIVE:  
SEPTEMBER 17, 1980

FLOOD INSURANCE RATE MAP REVISIONS:

Refer to the FLOOD INSURANCE RATE MAP EFFECTIVE  
date shown on this map to determine when actuarial rates apply to  
structures in the zones where elevations or depths have been  
established.

To determine if flood insurance is available in this community,  
contact your insurance agent, or call the National Flood insurance  
Program, at (800) 638-6620, or (800) 424-8872.



APPROXIMATE SCALE

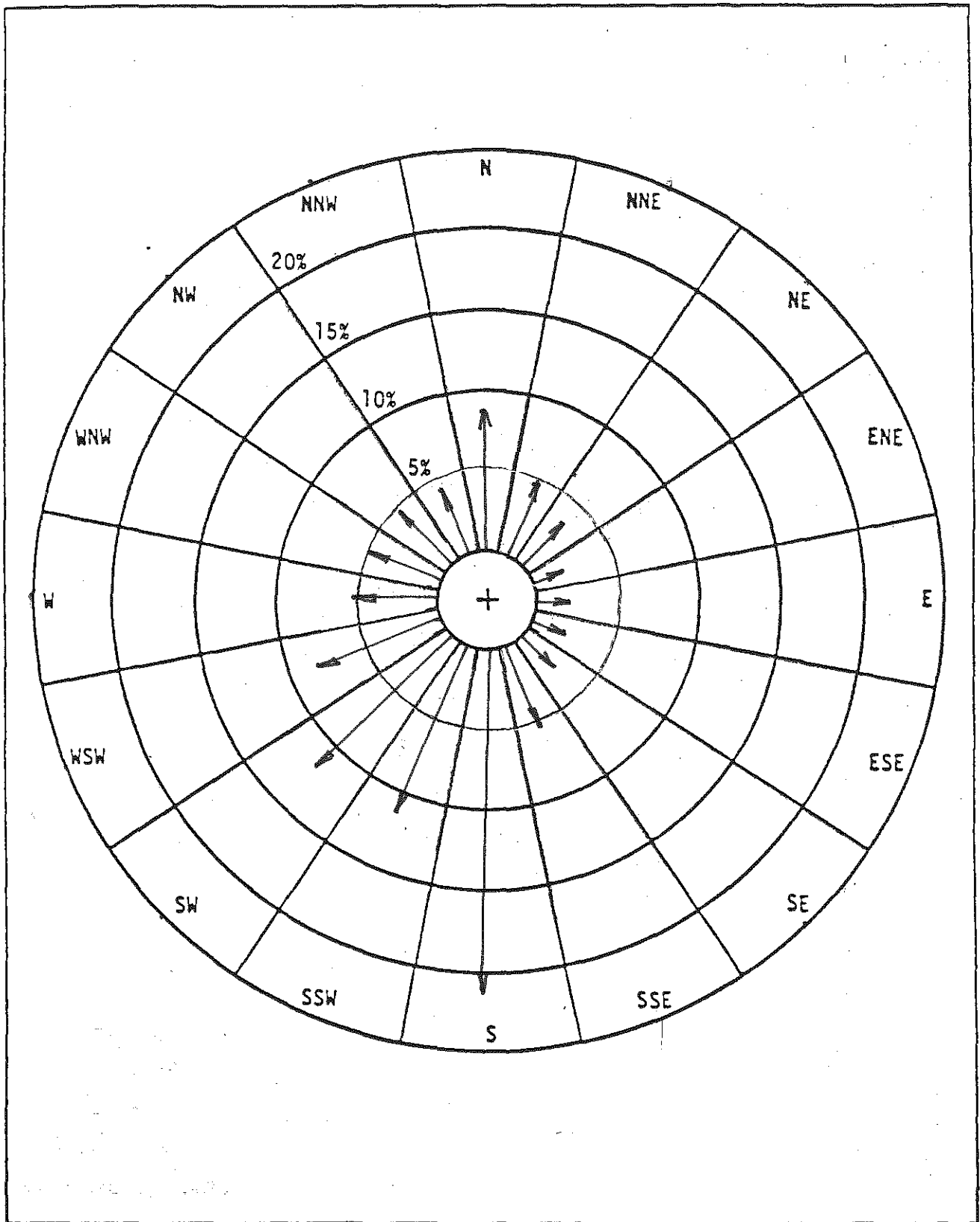
400 0 400 FEET

# PERCENT FREQUENCY BY DIRECTION

Direction/Site	Columbus	Cleveland	Mansfield	Dayton	Toledo	Youngstown
N	9.3	8.7	6.3	5.8	5.6	6.4
NNE	3.8	4.8	4.5	3.4	2.7	3.0
NE	4.3	3.8	3.2	3.3	4.2	3.4
ENE	3.5	1.9	2.1	3.2	5.7	2.7
E	6.7	2.3	3.4	5.3	6.2	5.1
ESE	6.1	2.3	2.7	4.8	3.4	5.0
SE	7.0	3.4	3.7	5.7	3.4	7.6
SSE	6.2	5.8	6.7	4.5	3.7	4.4
S	12.9	16.5	12.9	12.5	10.3	10.6
SSW	6.7	11.6	11.6	9.3	7.2	6.1
SW	5.4	11.1	9.2	7.4	9.6	9.5
WSW	4.9	8.2	8.7	7.2	11.4	9.0
W	8.5	5.4	10.9	10.7	10.4	10.7
WNW	4.6	4.7	5.4	6.0	6.8	5.4
NW	4.4	4.6	4.3	4.7	4.4	6.0
NNW	4.8	4.1	3.6	4.4	4.1	4.3

Based on STARDATA, 1970-1974 except Parkersburg, which was based on L.C.D., 1979-1981

WIND ROSE  
CLEVELAND, OHIO



McKesson Chemical Company

Personnel Training

(40 CFR Sec. 122.25(a)(12); 264.16)

The management structure of a McKesson Chemical branch is headed by a Branch Manager, to whom report a Branch Operations Manager and a Branch Administrative Manager. The last two positions have staff manager counterparts at the Regional Office (Montvale, New Jersey, in the present case), who provide formal training for new employees and refresher training for present employees in their respective disciplines. Thus, in addition to the on-the-job training/experience acquired by an employee, he/she is assured a formal teaching exposure which is then documented in his record.

All this training detail is routinely applied to McKesson employees in line with their daily exposure to hazardous chemicals and solvents - corrosive, flammable, combustible, oxidative. The subjects covered in this training for hazardous materials include:

Physical Handling of Chemicals

- Storage
- Compatibilities

Accident and Emergency Procedures

Safety Rules and Regulations

Housekeeping

The duties, responsibilities, and qualifications for these three management positions involved in hazardous waste management follow:

McKesson Chemical Company

Personnel Training

(40 CFR Sec. 122.25(a)(12), 264.16)

Position Title: Branch Manager

Responsibilities and Duties -

- Facility Emergency Coordinator.
- Responsible for selection of personnel and supervision of overall personnel training programs which includes proper use of equipment, fire fighting equipment, alarm systems, emergency procedures, material management (including waste items), maintenance, Contingency Plan implementation, etc.
- Supervises the facility's ongoing safety program which includes the conducting of monthly safety meetings.
- Works in conjunction with the Regional Office personnel (Montvale, New Jersey) in assuring the proper attainment of permits and licenses from local, state, and federal agencies.
- Supervision of branch sales personnel and the profitability of the facility. Works in resolving problems arising with potential customers who wish to utilize the Company's waste handling capabilities. Assure that customers and branch has appropriate permits and that all necessary and required data as set forth in the regulations and Company procedures is adhered with and present at the location for proper management of materials.

Responsibilities and Duties cont'd.:

- Addresses and takes appropriate actions on problems brought to his attention by subordinates.
- Makes proper notification of emergency situations and/or implementation of the Contingency Plan to appropriate Company and government authorities as outlined in other sections.

Experience and Qualifications:

- High School Graduate - College desirable.
- 3 - 5 years sales or sales management experience with supervisory responsibilities.

## Personnel Training

McKesson Chemical Company

Position Title: Branch Operations Manager

### Position Responsibilities -

1. Supervision of overall operation and maintenance of physical facilities involved with hazardous waste, pick up and storage.
2. Maintains physical aspects of facility compliance with RCRA and related permits.
3. Maintains standards of performance of drums and warehousemen in hazardous waste - related activities.
4. Maintains operating logs, maintenance records, monitoring records, inspection records, and all other required records.
5. Schedules all maintenance and repairs to structures and equipment related to HWM facility.

### Experience and Qualifications -

- High School Graduate.
- 1 - 2 years experience or training in transportation or handling of hazardous materials, and warehousing activities. Supervisory experience desirable.

PERSONNEL TRAINING

McKesson Chemical Company

Position Title: Branch Administrative Manager

Position Responsibilities -

1. Maintains inventory log of hazardous wastes - sources, lot numbers, purchase orders, quantities.
2. Creates manifests for shipments of hazardous waste to recycling facility.
3. Overall supervision of office activities which includes proper handling of paperwork involved in waste receipts and shipments as outlined by Company procedures.
4. Notifies Branch Manager of emergency situations and may act as an alternate emergency coordinator in his or the Branch Operations Assistants absence.

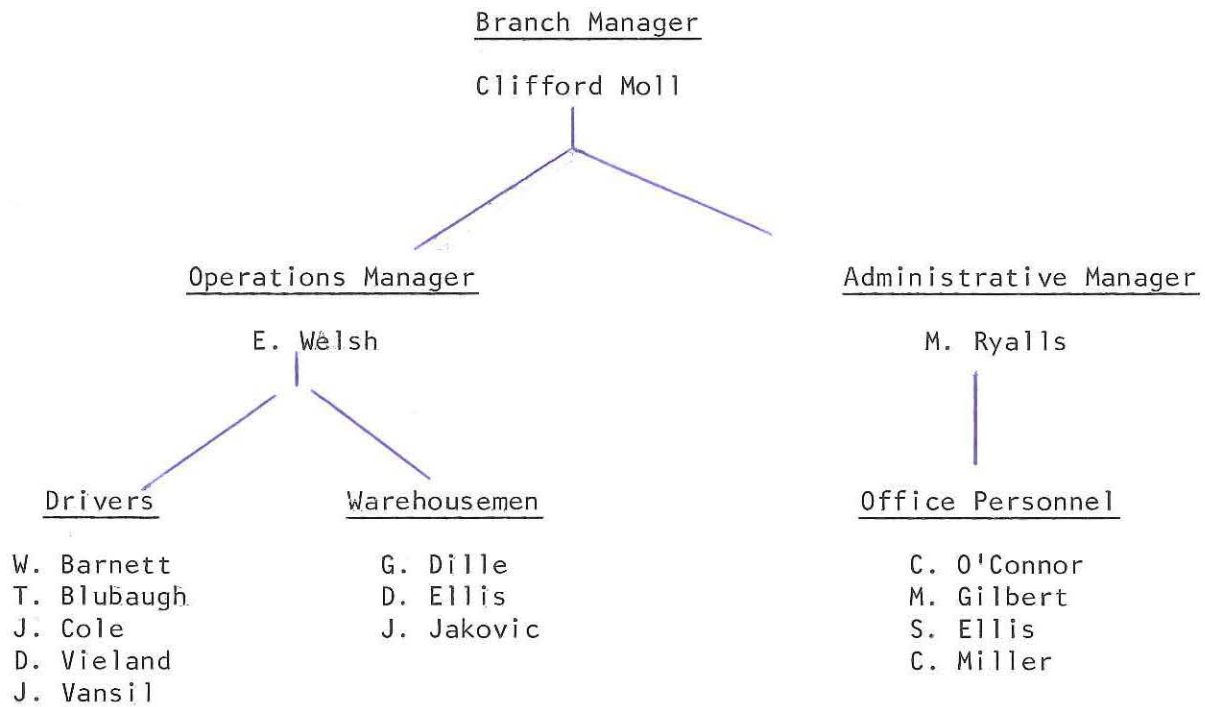
Experience and Qualifications -

- High School Graduate.
- 1 - 2 years in office related work with supervision experience desirable.

McKesson Chemical Company

Personnel Training

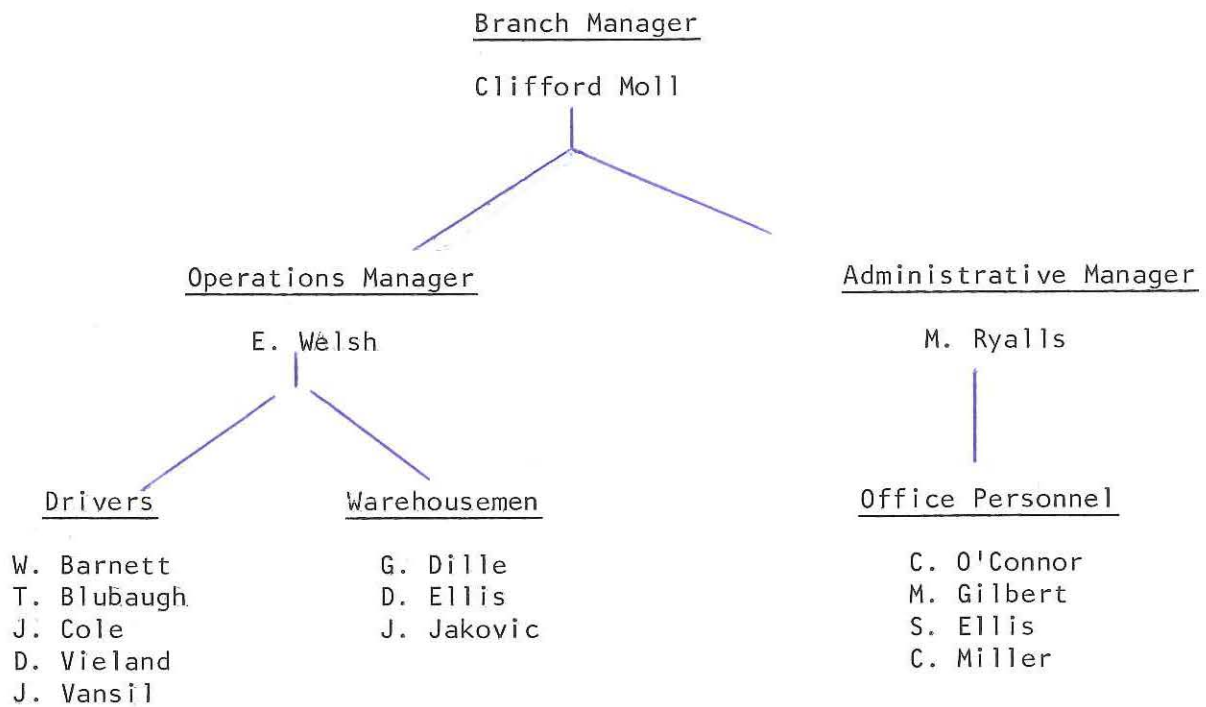
In the case of the Bedford Heights, Ohio, branch, the relevant organization chart is outlined below:



McKesson Chemical Company

Personnel Training

In the case of the Bedford Heights, Ohio, branch, the relevant organization chart is outlined below:



McKesson Chemical Company

Personnel Training

None of these individuals is required to be trained prior to employment in hazardous waste management situations. On-the-job training is accomplished within six months of employment by the Branch Manager and the Regional RCRA Coordinator on all facets of hazardous waste management. Responsibilities for hazardous waste management would not be delegated until such training is completed.

All three of these managers has attended a McKesson Chemical Company hazardous waste training session conducted by Dr. Donald M. Black, formerly Regional Operations and Safety Manager who is now full-time RCRA Coordinator for the Eastern Region of McKesson Chemical Company composed of sixteen facilities in eight states and five EPA Regions concerned with operation as a storage facility. Supplementary training concentration on the transport and manifest aspects of hazardous waste management is carried out by Mr. R. W. Von Dreau, the Assistant Regional Operations and Safety Manager of the Eastern Region. The overall training programs receive input from the Technical Director, Legal Department, Finance and Insurance support group in the Company's Home Office in San Francisco.

McKesson Chemical Company

Personnel Training

McKesson Chemical Company has developed the appended training outlines. Warehousemen and truck drivers attend hazardous waste training programs together. Copies of these training outlines are on file at the facility for use in the training or review of the actual employees which fall into the appropriate classification.

Included in the employees training program are sections providing instruction and indoctrination of all areas as outlined in these training guides as appropriate for the individuals job responsibilities. Specific sections are included in these guides which address the use, repair, inspection, and monitoring of safety equipment which may be required to be utilized in routine job functions as well as in emergency situations. Maintenance of other facility equipment is also covered in these outlines. Emergency plans and Contingency Plans are reviewed as well as necessary operating procedures to comply with Company and regulatory standards.

Key personnel are trained in similar areas of McKesson's business depending upon their area of responsibility. The training of such personnel is supplemented by staff personnel training sessions at the facility, Company conducted seminars, or visits to another Company site to work with experienced personnel holding a similar job position.

New employees filling a position at the facility which will be involved in hazardous waste management and/or handling shall be trained in all necessary facets hazardous waste management as outlined in 40 CFR 264.14 within six months of their employment or assignment to the facility. Employees which have not been fully trained in all appropriate sections pertaining to hazardous waste management shall not be allowed to work unsupervised until such

training is completed.

McKesson Chemical Company's policy is to conduct monthly safety meetings at all facilities. Included topics typically revolve around appropriate use of safety equipment, safe material handling and transport, emergency procedures, etc.

Emergency drills are conducted on a six month interval to reinforce job assignments and procedures. Annual hazardous waste handling review sessions shall be conducted as required under the regulations.

Personnel Training

Hazardous Waste Transport

1. EMERGENCY ACTION: In the event of an on-the-road spill or other emergency, the driver will follow these procedures:

- A. Remain with the unit and warn all pedestrians and motorists to stay away from the spill area, pointing out to them the danger involved and have someone call the police or fire department.
- B. Upon the arrival of the police or fire department, the driver will inform them of what kind of product has been spilled and request the area to be blocked off to both pedestrians and vehicles to prevent property damage or any serious personal injury.

The driver will request the police or fire department to protect the area while the driver reports to the company Emergency Coordinator (listed below in order of calling).

Name: Walter R. Landry  
Address: 27 Mayer Drive  
Suffern, NY 10901  
(Home): (914) 368-1898  
(Office): (201) 573-9480

Name: Donald M. Black  
Address: 11 Horton Lane  
New Canaan, CT 06840  
(Home): (203) 966-8670  
(Office): (201) 573-9480

Name: Ronald W. Von Dreau  
Address: RD #1 Box 134-C  
Salisbury Mills, NY 12577  
(Home): (914) 496-6894  
(Office): (201) 573-9480

Name: Alberto Rodriguez  
Address: 347 Hudson Street  
Cornwall-on-Hudson, NY 12520  
(Home): (914) 534-8488  
(Office): (201) 573-9480

C. The Emergency Coordinator will gather the information from the driver and contact the nearest appropriate Emergency Response Agencies and Emergency Response Contractor and provide the following information:

- 1. Name of person reporting the incident.
- 2. Name, address, and I.D. number of the transporter.
- 3. Phone number where person reporting can be reached.
- 4. Date, time, and location of the incident.
- 5. Mode of transportation and type of transport vehicle.
- 6. Brief description of the incident.

C. cont'd.

7. For each waste product involved provide:

- a. Name and I.D. number of generator.
- b. Product shipping, hazardous class, and UN or NA number.
- c. Estimated quantity of material spilled.
- d. If possible, the extent of contamination to land, water, or air.

8. Shipping name, hazard class, and I.D. number of any other material carried.

Emergency Response Agencies:

- |   |                   |
|---|-------------------|
| 1. Ohio EPA Emergency Response Team       | 1-(800) 282-9378  |
| 2. U.S. National Response Center -        | 1- (800) 424-8802 |
| 3. U.S. Environmental Protection Agency - | 1- (202) 655-4000 |
| 4. U.S. Coast Guard -                     | 1- (202) 426-2675 |
| 5. CHEMTREC -                             | 1- (800) 424-9300 |

Depending on the incident's geographical location, the following will be contacted:

1. County Health Department
2. Local Police
3. Local Fire Department
4. Local Municipality

D. Specific actions to be taken at the scene of the spill are:

1. Containment - The critical problem is to prevent any spilled liquid to escape into the ground or into a storm or sanitary sewer. A barrier is erected immediately to prevent such leakage, using whatever material is at hand - even a dirt curb to prevent spreading of the spill.

Simultaneously, the source of the spill or leak is located and controlled - a drum plugged or taped, or even turned upside down, for example.

2. Cleanup - With containment effected and the spillage source controlled, cleanup is the next step. If the leakage is contained on an impervious paved surface, material is absorbed onto a suitable substrate sand, diatomaceous earth, or any of a number of commercial oil-absorbent inert materials, for example. If the spillage has reached earth, all contaminated dirt is collected into drums or bags for disposal. Such disposal is under tightly controlled circumstances - at

D.

2. Cleanup cont'd. -

An E.P.A. approved site or by an approved waste disposal method.

In addition to contaminated absorbents, dirt, or the like as noted above, damaged containers also present a disposal problem. All McKesson branches possess "Recovery Drums" - special oversize metal drums that will easily hold the standard 55 gallon drum used universally by the chemical industry. If the local McKesson branch does not have the facilities to dispose of the damaged drum and its partial contents, it is transported by a McKesson truck to a larger McKesson branch with the proper facilities to handle the damaged drum and its contents.

II. EMERGENCY EQUIPMENT: In order to carry out the preceding steps, emergency equipment is available at two sources.

A. The transport unit itself carries the following:

1. Rubber gloves
2. Rubber apron
3. Rubber boots
4. Full face canister type respirator
5. Face shield, safety glasses, and goggles
6. Plastic sleeves
7. Polyvinyl clothing (jacket and pants)
8. First aid kit
9. Eye wash solution

B. There are three McKesson branches located in Columbus, Cincinnati and Dayton, Ohio to provide a support service for an episode in Ohio. Additional emergency equipment is available at all these locations.

Safety Equipment

- 2 - Butyl rubber acid suits (top, trousers, and hood)
- 2 - pair rubber boots
- 6 - pair gauntlet rubber gloves
- 6 - pair canvas gloves
- 4 - pair goggles
- 4 - face shields
- 4 - hard hats and liners
- 2 - 10# ABC fire extinguishers
- 4 - emergency reflective triangles, first aid kit
- 2 - canister masks with required canisters
- 1 - 30 minute air pack with back up tank, neutralizer solution/portable system

B.

Safety Equipment cont'd

- 3 - flashlights (6v)
- 4 - "No Smoking" highway signs

Tools/Miscellaneous

screwdrivers	transfer pump (with boron tubes)
hammers	100" extension cord
channel lock pliers	bags of sand and lime
needle-nose pliers	recovery drum (65 gallon)
linoleum knife	2' - 5' spade shovels
½" chisel	
pipe wrenches (24", 18")	
crested wrenches (12", 10", 6")	
bung wrenches	
assorted bungs	
duct tape	
lead wool	
stainless steel screws (assorted sizes) with rubber gaskets	
sheet rubber and teflon	
banding and banding tool	
box wiping rags	
(Note: Chlorine emergency kits and related items may be required in particular instances)	

C. All emergency equipment is inspected weekly and the inspection documented:

- First aid kit for depletion of supplies
- Protective clothing for rips, holes, and tears
- Eyewash solution for level of liquid
- Fire extinguishers for content level
- Air pack for content (pressure)
- Flashlights for "life"
- Tool check for depletion of supplies or absence of an individual item
- All other items such as absorbent materials, recovery drum, rope, tape, shovels, sand and lime, and extension cord for presence

Emergency Contractors - Ohio

Robert Rose & Sons, Inc.  
Grafton, Ohio

(216) 748-2171

Chemical Waste Management, Inc.  
Columbus, Ohio

(614) 457-7090

Solvent Resource Recover, Inc.  
West Carrollton, Ohio

(513) 859-6101

O. H. Materials Co.  
Findlay, Ohio

(419) 423-3526

III. FOLLOW-UP PROCEDURES: Two steps remain once the immediate emergency aspects of a spill have been taken care of:

- A. Decontamination - A truck or trailer exposed to a spill or leak will be taken to an authorized tank truck washout station where it will be steam cleaned.

Equipment will be decontaminated in the following manner:

Each item used will be placed in an open head container and thoroughly rinsed with water. The residue or wash water will then be neutralized and drained into a tight head container sealed and disposed of in accordance with Federal and State regulations at an authorized disposal site.

Clothing thought to be contaminated will be placed in an open head container and thoroughly rinsed with water. The residue or wash water will then be neutralized and drained into a tight head container, sealed, and disposed of in accordance with Federal and State regulations at an authorized disposal site. If clothing has been seriously ripped or torn, it will be cleaned and then discarded.

- B. Notification - The Department of Transportation, Director of Hazardous Materials Registration, Materials and Transportation Bureau, Washington, D.C. 20590 will be notified, in writing, of the occurrence and nature of the incident and will send a copy to the New Jersey Department of Environmental Protection.

IV. TRAINING PROGRAM: In preparation for handling hazardous materials and hazardous wastes, all drivers and warehousemen receive approximately six hours classroom training conducted by Regional Office personnel, followed by refresher training by local management at regular scheduled (at least monthly) Safety meetings. In addition to the above, an annual Regional meeting is held to educate further each Branch Operations supervisor on changes in regulations.

The following is a list of classroom training provided to all branch personnel responsible for the handling and storage of Hazardous Waste:

- |  |                                 |
|--|---------------------------------|
| 1. Hazardous waste manifesting             | 7. Emergency response equipment |
| 2. Container receiving and maintenance     | 8. Emergency procedures         |
| 3. Container inspections                   | 9. Hazardous waste labelling    |
| 4. Container transferring                  | 10. Product compatibility       |
| 5. Container pick-up checklist             | 11. In-house maintenance checks |
| 6. Reuse of containers for Hazardous Waste | 12. Emergency spills            |

Since much of the drivers' actions involve hazardous materials, including hazardous wastes, their instructions specifically include:

1. Inspection of their vehicles before and during trips
2. Driving rules

IV. TRAINING PROGRAM cont'd.:

3. Knowledge of safety and health hazards of products carried (i.e., flammable, corrosive)
4. Actions to be implemented in case of spills, accidents, or other emergencies involving hazardous materials and hazardous wastes

A copy of the Index of McKesson's Drivers' Training Manual is appended, as well as copies of the sign-off sheets signed by McKesson drivers receiving the training described above.

## INDEX

Section I	Vehicle Inspection	Pages 1 - 2
Section II	Hours of Service	Pages 3 - 13
Section III	Coupling	Pages 14 - 17
Section IV	Uncoupling	Pages 18 - 19
Section V	Driving Rules	Pages 20 - 21
Section VI	Emergency Procedures	Page 22
Section VII	General First Aid	Pages 23 - 25
Section VIII	Cargo Tanks	Pages 26 - 36
	Subpart A - Driving	Pages 26 - 34
	Subpart B - Operating	Pages 35 - 36
Section IX	Static Electricity	Pages 37 - 52
Section X	Flammable Liquids	Pages 53 - 55
Section XI	Top Loading	Pages 56 - 57
Section XII	Bottom Loading	Pages 58 - 64
Section XIII	Acids and Corrosives	Pages 65 - 71
Section XIV	Acid Safety Equipment	Page 72
Section XV	Acid Loading	Pages 73 - 74
Section XVI	Delivering Acids	Pages 75 - 82
Section XVII	Acid First Aid	Pages 83 - 85
Section XVIII	Acid Spill Procedures	Pages 86 - 86

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Information compiled from:

1. Professional Motor Transport Activities, Inc.
2. National Safety Council
3. Interstate Commerce Commission

I HAVE ATTENDED A TRAINING PROGRAM CONDUCTED ON \_\_\_\_\_  
COVERING THE D.O.T. REGULATIONS LISTED BELOW. I ALSO UNDERSTAND  
MY RESPONSIBILITY AS AN EMPLOYEE OF McKESSON CHEMICAL COMPANY,  
TO COMPLY WITH THESE REGULATIONS TO THE BEST OF ABILITY:

- A. VEHICLE INSPECTION
- B. HOURS OF SERVICE
- C. COUPLING
- D. UNCOUPLING
- E. DRIVER RULES
- F. EMERGENCY PROCEDURES
- G. GENERAL FIRST AID
- H. DRIVING AND OPERATING CARGO TANKS
- I. STATIC ELECTRICITY
- J. FLAMMABLE LIQUIDS
- K. TOP LOADING OF FLAMMABLE LIQUIDS
- L. BOTTOM LOADING OF FLAMMABLE LIQUIDS
- M. ACIDS AND CORROSIVES
- N. ACID SAFETY EQUIPMENT
- O. ACID LOADING
- P. ACID DELIVERIES
- Q. ACID FIRST AID
- R. ACID SPILL PROCEDURES

I ALSO UNDERSTAND THAT IT IS MY RESPONSIBILITY TO READ AND COMPLY  
WITH THIS PROGRAM, AND ALL STATE AND FEDERAL REGULATIONS.

BRANCH \_\_\_\_\_ SIGNED \_\_\_\_\_  
DATE \_\_\_\_\_

I HAVE ATTENDED A TRAINING PROGRAM CONDUCTED ON \_\_\_\_\_  
COVERING THE D.O.T. REGULATIONS LISTED BELOW. I ALSO UNDERSTAND  
MY RESPONSIBILITY AS A EMPLOYEE OF McKESSON CHEMICAL COMPANY  
TO COMPLY WITH THESE REGULATIONS TO THE BEST OF MY ABILITY:

1. Hazardous Materials/Hazardous Waste Regulations.
2. Vehicle Placarding Regulations.
3. Product Compatabilities.
4. Drivers Regulations.
5. Bills of Lading/Shipping Papers/Hazardous Waste Manifests.
6. Loading and Unloading of H/M and H/W.
7. Cintainer Labeling.
8. Handling of Empties.
9. Emergency Procedures.

- A. On the dock.
- B. In transit.

SIGNED \_\_\_\_\_

DATE \_\_\_\_\_

I FURTHER UNDERSTAND AS THE DRIVER, I HAVE THE FINAL RESPONSIBILITY  
TO MAKE SURE MY LOAD MEETS THE REQUIRED REGULATIONS.

SIGNED \_\_\_\_\_

DATE \_\_\_\_\_

McKesson Chemical Company

Personnel Training

Relevance of Training to Job Position -

All operating and management personnel at all McKesson branches have always been formally trained in the aspects of the handling and management of hazardous materials their positions impinge upon. With the advent of McKesson's entry into the recycling of hazardous wastes, such formal training has required only an extension of subject matter to include hazardous wastes, since the latter are invariably only used ("spent") versions of the original hazardous materials already received, stored, and distributed.

Examples are McKesson's truck drivers, who receive formal periodic training on truck inspection, maintenance, DOT rules and procedures, emergency and clean-up procedures, and so on. Branch management is trained on requirements of hazardous waste containment, inspections, logs, inventory control, and so on. In other words, training is tiered toward the specifics of the position and its interface with hazardous waste.

122.25(a) (13)  
(15) (16)

McKesson Chemical Company

Closure and Post-Closure Plans

(40 CFR Sec. 122.25(a)(13), 264.111 - 264.120, 264.78, 264.197

264.258, 122.25(a)(14), 122.25(a)(15), 264.142)

This section outlines the steps which the subject McKesson Chemical Company storage facility will follow in a closure situation in order to comply with applicable sections as outlined in the Resource Conservation and Recovery Act.

Because this facility functions as only an accumulation and transfer point for containerized spent solvents destined for recycling at another Company owned facility, partial closure is not relevant. Because the accumulation and transfer of materials which may be classified as hazardous wastes is but a small portion of the total business at this facility, and due to the fact that this activity is the sole reason for McKesson's being involved in the requirements of this legislation, there exist no partial closure situations. This facility, as it pertains to hazardous waste management activities, is either active or totally inactive as a storage facility. For this reason, partial closure will not be addressed.

It should be further noted that because of the nature of the activity at this facility, that accumulation and temporary storage of spent solvents in drums until economic truckloads can be shipped to a recycling facility, a post-closure plan will not be required because materials are being continually removed from this facility; in a closure situation, all materials would be removed in a similar fashion as practiced in routine day-to-day business.

McKesson Chemical Company will maintain a copy of this closure plan at the facility. The Company is aware that should this facility contemplate

closure of the site, the EPA, Regional Administrator, and the comparable state agency must be notified at least 180 days prior to the date that the Company closes the facility.

McKesson Chemical Company will continue to operate business at this facility as long as it is deemed economically viable by the Company, and so long as its operation is otherwise permitted by applicable law. The Company is thus, at this time, unable to specify anticipated date of closure.

The Company is aware that upon completion of closure, it shall be required to submit to the Regional EPA Administrator and the comparable state agency a certification by both McKesson Chemical Company and an independent registered professional engineer that the facility has been closed in accordance with the outlined proceedings contained in the approved closure plan.

Procedures developed by McKesson Chemical Company for managing waste materials are designed to ensure the facility's compliance with applicable laws, and to eliminate any necessity for further maintenance or control to prevent threats to human health or the environment. As outlined in the section entitled "Secondary Containment System Design and Operation", any evidence of unintentional leakage and subsequent containment will be sampled and analyzed to determine the specific contaminant and degree of clean up necessary. All contaminated materials will be removed and disposed of at a permitted disposal facility. The containment area shall be regraded to the original design in the event of surface material removal. The container(s) which indicate release of material shall be found, segregated, and handled in the proper manner to alleviate further release of material in accordance with Company procedures. The incident shall be reported and documented as appropriate based upon severity

and circumstances.

Due to the nature of McKesson Chemical Company's involvement in hazardous waste management, it becomes extremely difficult to be specific on the maximum quantities and types of material which would be on hand in a closure situation.

Because McKesson Chemical Company is involved in the commercial recycling of various halogenated and non-halogenated solvents from off-site generators, the make-up and quantity of the materials which would be on hand at any time at this facility is difficult to predict with foolproof accuracy. Factors such as economic conditions, seasonal trends, and market growth will impact a particular generator's rate of use of materials, and thus affect the amount of materials shipped to this location for temporary storage and eventual recycling.

In no case, will this facility store more than 110 55 gallon drums at any one time. In the majority of cases, the maximum number of containers held at any one time will be below this quantity. Under the typical mode of operation at this facility, when a full truckload quantity of material is accumulated (typically 70 - 80 drums), it will be shipped to the recycling center. The reason for the higher maximum quantity is to facilitate peaks in shipments of spent materials from generators, scheduling requirements, etc.

In the event that McKesson Chemical Company made an assessment that it were to initiate closing of this site as a hazardous waste storage facility, we are aware of the required 180 day notice period required by the EPA. In the event that closure of this facility were to be undertaken, notices would be sent to present generators employing our services to inform them of our pending discontinuation of receiving their waste materials. All materials shall be removed from the site within 90 days of receipt of the final volume of

waste and total closure activities will be completed with 180 days as required as a maximum.

Once formal approval of the planned closure procedures are received from the agency, the anticipated total time required to schedule trucks into the facility, load up all drummed material, and clean (if required) the containment area is a maximum of ten days. Although all inventory in storage at the time of closure would be presumed to be material destined for recycling, for computations of this closure plan we are assuming the inventory at closure will need to be disposed of. If, in fact, the waste inventory is capable of being recycled, such a mode of operation would be undertaken and the refined material could be sold through another of McKesson Chemical Company's distribution branches. Based upon this type of dealing with the materials on hand at the time of closure, the cost of closure would be greatly reduced because of the economic value realized from the sale of the refined material. Regardless, we have taken a "worst case" posture in calculating the cost of closure by assuming disposal.

McKesson Chemical Company does not foresee nor anticipate the need for requesting any extensions for closure time for this facility.

Because this facility functions strictly as a storage facility, with no treatment or disposal at this location, decontamination activities would not be anticipated to be necessary.

If for some unforeseeable reason it were discovered that decontamination were necessary, this would be accomplished simultaneously with other closure preparation so that shipment of decontamination material could be shipped along

with the other inventory for disposal. For purposes of this closure calculation, we are assuming a worst possible situation in calculating decontamination necessity. Decontamination would be accomplished by utilizing a pressurized steam cleaning unit.

All waste and waste containers will be disposed of through McKesson EnviroSystems. As mentioned earlier, we would fully anticipate all waste items in storage at closure to be capable of being recycled, but for purposes of this calculation we are assuming that materials would be transferred to McKesson EnviroSystems. No pretreatment would be required before material were readied for shipment. Prior to loading, all drums would be inspected for leakage, damage, and proper labelling. Proper manifest forms will be completed for the movement.

None of the equipment utilized at this facility would be required to be disposed of due to its utilization in waste management. At most, a simple rinse-off utilizing the pressurized steam cleaning equipment would be necessary of the forklift.

It should be noted that McKesson Chemical Company at this location, does not have tanks which are utilized for the management of waste materials and thus, shall not be required to provide details of closure for such.

McKesson Chemical Company likewise does not have waste piles present at this location and thus, is not required to provide details of closure.

This closure plan and cost estimate will be kept on file at the McKesson facility. It shall be revised and resubmitted whenever a change in the closure plan affects the cost of closure. It shall be reviewed and adjusted annually to reflect changes in closure cost brought about by inflation, utilizing published index's available.

Because McKesson Chemical Company at this location functions only as a hazardous waste storage facility, notation is not necessary in the deed to inform potential purchasers of restrictions.

It is hopefully inconceivable that the recycling sister of McKesson Chemical Company — McKesson EnviroSystems Company — would go out of business or become unavailable otherwise for disposal of any stock of spent solvents at this branch of McKesson. If this situation did arise, however, other permitted recyclers are available for processing/reclaiming the spent solvents inventory at a McKesson branch undergoing closure. The copy of a letter from a local Ohio recycler following this page illustrates the availability of such alternates. Although their costs may be higher than those based on our internal McKesson disposal, the overall total is well within the demonstrated financial assurance capability of Foremost-McKesson.

Following is a formal Closure Plan and calculations showing how the closure cost for the facility was calculated.

## CLOSURE PLAN

Facility I.D. Number OHD071107791

Owner or Operator: McKesson Chemical Company  
Division of Foremost-McKesson, Inc.

Address: 26601 Richmond Road  
Bedford Heights, OH

Telephone: (216) 292-7500

McKesson Chemical Company's major business is that of nationwide distribution of organic and inorganic chemicals. It also provides various services to its customers, which may include picking up and transporting drummed materials of wastes to central recycling facilities. This may, at times, require temporary storage at our facility of some drummed materials in order to accumulate full truckloads.

### I. Facility Conditions

#### A. General Information:

The facility size at this location is 20,500 sq. ft. of which only a small portion (e.g., loading docks) is used for handling of waste products which are accumulated from outside generators, and are destined for recycling once full truckloads are acquired. Waste storage is accumulated in the area outside the building, designated on the Layout Diagram. All unloading area floors are of impervious concrete. The designated storage area is made of impervious concrete. Total area utilized for waste storage is approximately 10 feet by 30 feet.

Fifty-five (55) gallon drums are the only storage method used. Drums are placed on wooden pallets (four (4) per pallet) and set within the containment area on the same pallet to minimize handling and potential spills.

The types of waste stored at this facility fall mainly into the following categories:

<u>E.P.A. WASTE NO.</u>	<u>DESCRIPTION</u>
F001	Spent halogenated solvents used in degreasing.
F002	Spent halogenated solvents.
F003	Spent non-halogenated solvents.
F004	Spent non-halogenated solvents.
F005	Spent non-halogenated solvents.

It should be noted that this facility only accumulated these items from outside generators for storage until a truckload quantity can be built up to make it economically feasible to ship to a Recycling facility. None of the above mentioned items are generated as a waste on-site.

B. Maximum amount of waste inventory is 120 (55) gallon drums (6600 gallons).

C. Equipment:

1. Forklift
2. Pallets

D. Closure Schedule:

1. Removal of Inventory - Total time to schedule trucks into facility, load drummed material, and clean (if necessary), and remove containment area is anticipated at a maximum of five (5) days.

Because this facility functions strictly as a storage facility with no transferring or treatment at the location, decontamination activities would not be anticipated to be necessary.

If for some unforeseeable reason it were discovered that decontamination was necessary, this would be accomplished simultaneously with other closure preparation so that shipment of decontaminated material could be shipped with inventory for recycling.

2. Removal Of Inventory:

All waste and waste containers will be sent to McKesson EnviroSystems (formerly Inland Chemical). We fully anticipate all materials in inventory at this facility to be capable of being recycled, but in the event materials are required to be land filled, McKesson EnviroSystems has access to this method. No pretreatment would be required before materials were readied for shipment. No treatment or disposal will occur at our location. Prior to loading, all drums are inspected for leakage, damage, and proper labeling. Proper manifest forms will be completed for the movement.

3. Facility Decontamination:

- A. The floor of the diked containment area will be steam cleaned using water and the resulting residual placed in a 55 gallon drum for disposal.
- B. Amount of waste generated from decontaminant, if required, would not exceed one (1) 55 gallon drum.
- C. All wooden pallets used with waste storage would be shipped at the same time as inventory to be landfilled, if they were found to be unfit for further usage.

McKesson Chemical Closure Cost Estimate

Bedford Heights Branch

<u>I. Basic Disposal Charge</u>		
110 drums at \$65.00		\$7,150.00
<u>II. Warehouse Labor (Loading)</u>		
Hourly rate including fringe benefits - 3 hours required.		\$33.98
<u>III. Transportation</u>		
To McKesson Envirosystems, New Castle, Kentucky 321 miles @ \$1.50/mile — two loads.		\$963.00
<u>IV. Equipment Cost</u>		
Forklift at \$4.50/hour		\$13.50
<u>V. Decontamination Cost</u>		
Secondary Containment Area Cleaning 2 hours @ \$30.00/hour	\$60.00	
Disposal of Cleanup residue 2 drums @ \$65.00	\$130.00	
Disposal of Pallets	\$100.00	
Laboratory Services	<u>\$100.00</u>	
		\$390.00
VI. Contingencies at 20% of Subtotal of \$8550.48		\$1710.10
VII. Engineer Certification		\$300.00
<u>Total Cost of Closure</u>		\$10,560.58

SRR

TM

## SOLVENT RESOURCE RECOVERY, INC.

4301 Infirmary Road  
P. O. Box 453  
West Carrollton, Ohio 45449  
(513) 859-6101

March 30, 1983

McKesson Chemical  
136 Summit Ave.  
Montvale, N.J. 07645

Attn: Donald Black

Re: Waste Disposal Quotation

Responding to your telephone request of today, I am pleased to quote the following.

To satisfy your requirement for RCRA Part B Permit, Closure Plan, Solvent Resource Recovery, Inc. will accept drum solvents at the following disposal rate.

Correctly identified drums	\$35.00 per drum
Unidentified drums	\$45.00 per drum
Drums with less than 50% solids	\$50.00 per drum
Drums with more than 50% solids	\$95.00 per drum

These prices do not include transportation cost. All shipments FOB our dock and all shipments properly manifested.

Should you require any further information, please feel free to contact me.

Sincerely,



A. H. Kohnen, P.E.  
General Manager

AHK/lm

McKesson Chemical Company

Financial Assurance Mechanism for Closure and Liability Requirements

(40 CFR Sec. 122.25(a)(15), 264.143, 264.151, 122.25(a)(17)

264.147, 122.25(a)(18), 264.149, 264.150)

McKesson Chemical Company, through its parent corporation Foremost-McKesson, Incorporated of One Post Street, San Francisco, California, on June 27, 1983, provided to the Office of the Regional Administrator, Region V, the necessary financial tests and assurances, as well as the required guarantee for subsidiaries, for closure and liability assurance requirements. These were the annual updating and revising, required by statute, of the original figures filed on July 5, 1982. Immediately following this narrative will be found a copy of the Corporate Senior Counsel's letter dated June 27, 1983, submitting necessary information to fulfill this financial test and assurance. Included also are the following as outlined in his letter:

1. The letter of Neil E. Harlan, Chairman of the Board and Chief Financial Officer of Foremost-McKesson, Incorporated.
2. The Annual Report of Foremost-McKesson, Incorporated for the fiscal year ended March 31, 1983, which report contains the independent certified public accountant's report on the financial statements of the Foremost Group.
3. The special report of DeLoitte, Haskins & Sells, dated June 27, 1983, to the effect specified in the regulations.

It should be noted in the included materials that these assurances are being presented for closure, post-closure, and liability requirements. The post-closure cost estimate and financial assurances for such do not apply to a temporary storage facility. Both closure and liability requirements should be adequately met by the included information.

June 27, 1983

FOREMOST  
McKESSON

Office of the Regional Administrator  
Environmental Protection Agency  
Region V  
Federal Building  
230 South Dearborn  
Chicago, Illinois 60604

Re: Federal Financial Requirements  
Hazardous Waste TSD Facilities

Dear Sir/Madam:

On behalf of Foremost-McKesson, Inc. and its wholly-owned subsidiaries (the "Foremost Group") we hereby submit the enclosed documents to meet the financial test and to demonstrate the financial responsibility of the Foremost Group under the standards of the Environmental Protection Agency applicable to owners and operators of hazardous waste treatment, storage and disposal facilities.

1. The letter of Neil E. Harlan, Chairman of the Board and Chief Financial Officer of Foremost-McKesson, Inc. ("Foremost");

2. The Annual Report of Foremost-McKesson, Inc. for the fiscal year ended March 31, 1983, which report contains the independent certified public accountants' report on the financial statements of the Foremost Group; and

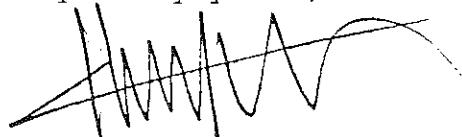
3. The special report of Deloitte Haskins & Sells to the effect specified in the regulations.

The facilities owned by the Foremost Group are either operated by McKesson Chemical Company (a division of Foremost) or McKesson Envirosystems Company (a wholly-owned subsidiary of Foremost). Please note that we are submitting this material to satisfy both the requirements for liability coverage, and closure care. Note further that the figure indicating the sum of closure cost estimates is an aggregate of the estimates for the facilities in all EPA regions -- although only the specific facilities in your region are listed in Mr. Harlan's letter.

Office of the Regional Administrator  
Environmental Protection Agency  
June 27, 1983  
Page Two

I trust that you will find all of the enclosed material to be in order; however, should you have questions or require further information or details, kindly address all inquiries on this matter to me. Thank you very much.

Very truly yours,

A handwritten signature in dark ink, appearing to read 'Ivan D. Meyerson'. The signature is stylized with a series of vertical strokes and a long, sweeping horizontal line extending to the right.

Ivan D. Meyerson  
Assistant General Counsel

IDM/smc

Encl.

June 27, 1983

Office of the Regional Administrator  
Environmental Protection Agency  
Region V  
Federal Building  
230 South Dearborn  
Chicago, Illinois 60604



Re: Foremost-McKesson, Inc. Financial Tests  
for Liability Coverage and Closure Cost Care

Dear Sir or Madam:

I am the Chief Financial Officer of Foremost-McKesson, Inc. ("Foremost") located at One Post Street, San Francisco, California 94104. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure care as specified in Subpart H of 40 CFR Parts 264 and 265.

Foremost is the owner or operator of the following facilities for which liability coverage is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265:

\*See Exhibit "A" attached hereto and fully incorporated herein by reference.

1. Foremost owns or operates the following facilities for which financial assurance for closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure cost estimates covered by the test are shown for each facility:

\*See Exhibit "B" attached hereto and fully incorporated herein by reference.

2. Foremost guarantees through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure care of the following facilities owned or operated by its subsidiaries. The current cost estimates for the closure care so guaranteed are shown for each facility.

\*See Exhibit "C" attached hereto and fully incorporated herein by reference.

3. In states where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 and 265, Foremost is demonstrating financial assurance for the closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure cost estimates covered by such a test are shown for each facility:

\*None.

4. Foremost owns or operates the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a state through the financial test or any other financial assurance mechanism specified in Subpart H or 40 CFR Parts 264 and 265 or equivalent or substantially equivalent state mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility:

\*None.

Foremost is required to file a Form 10K with the Securities and Exchange Commission ("SEC") for the latest fiscal year.

The fiscal year of Foremost ends on March 31. The figures for the following items marked with an asterisk are derived from Foremost's independently audited, year-end financial statements for the latest completed fiscal year ended March 31, 1983:

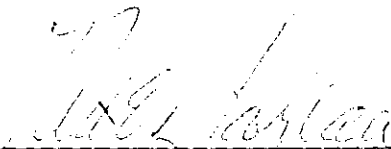
ALTERNATIVE II

- |  |               |
|--|---------------|
| 1. Sum of current closure cost estimates. (EPA Regions I-X)                | \$4,635,930   |
| 2. Amount of annual aggregate liability coverage to be demonstrated.       | \$2,000,000   |
| 3. Sum of lines 1 and 2.   | \$6,635,930   |
| 4. Current bond rating of most recent issuance and name of rating service: | Moody's - A   |
| 5. Date of issuance of bond.   | April 1, 1982 |

Office of the Regional Administrator  
Environmental Protection Agency  
June 27, 1983  
Page Three

6. Date of maturity of bond.	April 1, 2012
*7. Tangible Net Worth.	\$417,283,000
8. Total assets in the U.S.	Not Applicable
9. Is line 7 at least \$10 Million?	Yes
10. Is line 7 at least 6 times line 3?	Yes
11. Are at least 90% of assets located in the U.S.?	Yes

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.157(g) as such regulations were constituted on the date shown immediately below.

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\_\_\_\_\_  
Neil E. Harlan  
Chairman of the Board  
Foremost-McKesson, Inc.

NEH/smc

June 27, 1983

EPA REGION V

<u>Facility Address</u>	<u>EPA #</u>
Cincinnati - 3025 Exon Avenue Evendale, Cincinnati, Ohio 45241	#OHDOO2899847
Cleveland - 26601 Richmond Road Bedford Heights, OH 44146	#OHDO71107791
Columbus - 1795 E. Moler Road Columbus, OH 43207	#OHDO39991690
Dayton - 2228 W. Dorothy Lane Dayton, Ohio 45439	#OHDOOO780338
Detroit - 27001 Trolley Industrial Drive Taylor, MI 48180	#MIDO10861524
Grand Rapids - 4975 Starr Street S.E. Grand Rapids, MI 49506	#MIDO53670063
Appleton - P.O. Box 23 Appleton, WI 54911 1836 W. Rogers Avenue	#WIDO30177620
Bloomington - 2010 N. Eagle Road Normal, IL 61761	#ILDO00781633
Chicago - 600 Hunter Drive Oak Brook, IL 60521	#ILD070687165
Chicago Heights - P.O. Box 456 Chicago Heights, IL 60411	#ILDO47029223

EXHIBIT "A"

EPA REGION V CONTINUED:

Dolton (Repack Center)  
633 138th Street  
P.O. Box 304  
Dolton, IL 60419

#ILD000781641

Milwaukee (West Allis)  
P.O. Box 14545  
Milwaukee, WI 53214  
1707 S. 101st Street  
West Allis, WI

#WIDO40784936

Minneapolis - 111 22nd Avenue, N.E.  
Minneapolis, MN 55418

#MNDOS4497052

Schaumburg - 2055 Hammond Drive  
Schaumburg, IL 60195

#ILDO00819938

McKesson EnviroSystems Company  
Recycling Facility  
633 East 138th Street  
Dolton, Illinois

#ILD005097670

EXHIBIT "A"

## EPA REGION V

<u>Facility Address</u>	<u>EPA #</u>	<u>Closure/Post-Closure Cost Estimates</u>
Cincinnati - 3025 Exon Avenue Evendale, Cincinnati, Ohio 45241	#OHDOO2899847	\$ 9,777
Cleveland - 26601 Richmond Road Bedford Heights, OH 44146	#OHDO71107791	\$ 10,660
Columbus - 1795 E. Moler Road Columbus, OH 43207	#OHDO39991690	\$ 9,926
Dayton - 2228 W. Dorothy Lane Dayton, Ohio 45439	#OHDOO0780338	\$ 9,705
Detroit - 27001 Trolley Industrial Drive Taylor, MI 48180	#MIDO10861524	\$ 10,589
Grand Rapids - 4975 Starr Street S.E. Grand Rapids, MI 49506	#MIDO53670063	\$ 10,530
Appleton - P.O. Box 23 Appleton, WI 54911 1836 W. Rogers Avenue	#WIDO30177620	\$ 10,323
Bloomington - 2010 N. Eagle Road Normal, IL 61761	#ILDO00781633	\$ 11,385
Chicago Heights - P.O. Box 456 Chicago Heights, IL 60411	#ILDO47029228	\$ 11,445

EPA REGION V CONTINUED:

Milwaukee (West Allis)  
P.O. Box 14545  
Milwaukee, WI 53214  
1707 S. 101st Street  
West Allis, WI

#WIDO40784936

\$ 9,669

Minneapolis - 111 22nd Avenue, N.E.  
Minneapolis, MN 55418

#MNDO54497052

\$10,400

Schaumburg - 2055 Hammond Drive  
Schaumburg, IL 60195

#ILDO00819938

\$10,125

TOTAL: \$124,534

EPA REGION V

Facility Address

EPA #

Closure/Post-Closure  
Cost Estimate

633 East 138th Street  
Dolton, Illinois

ILDOO5097670

\$122,000

The above facility is operated by McKesson EnviroSystems Company,  
a California corporation and wholly-owned subsidiary of Foremost-  
McKesson, Inc.

EXHIBIT "C"

**Deloitte  
Haskins + Sells**

44 Montgomery Street  
San Francisco, California 94104  
(415) 393-4300  
Telex 340336

Foremost-McKesson, Inc.:

We have examined the consolidated financial statements of Foremost-McKesson, Inc. for the year ended March 31, 1983, and have issued our report thereon dated May 23, 1983. Our examination was made in accordance with generally accepted auditing standards and, accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances. We have not performed any auditing procedures beyond the date of our opinion on the consolidated financial statements; accordingly, this letter is based on our knowledge as of that date and should be read with that understanding.

At your request, we have performed the procedures described below with respect to the accompanying letter from Mr. Neil E. Harlan, Chairman of the Board, Foremost-McKesson, Inc. to the Regional Administrator - Environmental Protection Agency dated June 27, 1983. It is understood that this report is solely for filing with the Environmental Protection Agency in accordance with requirements of the Resource Conservation and Recovery Act, and is not to be used for any other purpose. The procedures that we performed are summarized as follows:

We recomputed from, or reconciled to, the consolidated financial statements referred to in the first paragraph the information included in items 7 and 11 under the caption Alternative II in the letter referred to above.

Because the procedures referred to in the preceding paragraph were not sufficient to constitute an examination made in accordance with generally accepted auditing standards, we do not express an opinion on any of the information or amounts listed under the caption Alternative II in the aforementioned letter. In performing the procedures referred to above, however, no matters came to our attention that caused us to believe that the information or amounts included in items 7 and 11 should be adjusted.

*Deloitte Haskins + Sells*

June 27, 1983